EXHIBIT 46

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Page 1
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                  UNITED STATES DISTRICT COURT
                    DISTRICT OF VERMONT
 2
 3
     JAMES D. SULLIVAN, et
     al, individually, and
 4
     on behalf of a Class of )
 5
     persons similarly
                               )
     situated,
                                   Civil Action No.
                                   5:16-cv-00125
 6
                               )
              Plaintiffs,
                               )
 7
                               )
        vs.
 8
     SAINT-GOBAIN
 9
     PERFORMANCE PLASTICS
     CORPORATION,
10
              Defendant.
11
12
                  VIDEOTAPED DEPOSITION OF LINDA CRAWFORD,
13
14
          taken pursuant to notice before Beth Gaige,
15
          Registered Professional Reporter, at the
          offices of BarrSternberg Moss Silver & Munson,
16
17
          P.C. 507 Main Street, Bennington, Vermont, on
18
          April 25, 2018, commencing at 9:25 a.m.
19
20
21
22
23
24
25
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	Page 2
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25	

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STIPULATION

(It is hereby agreed by and between the parties that signature is not waived.)

_ _ _ _ _ _ _ _ _ _

THE VIDEOGRAPHER: Good morning. We are now going on the record at 9:25 a.m. Today's date is April 25, 2018. Please note that microphones are sensitive and may pick up whispering and private conversations and cellular interference. Please turn off or keep phones muted and away from microphones as they are known to interfere with deposition audio once in a while, and audio-video recording will continue to take place unless all parties agree to go off the record.

This is media unit number one of the video-recorded deposition of Linda Crawford taken by counsel for defendants in the matter of James D. Sullivan, et al, individually and on behalf of persons similarly situated as plaintiffs, versus Saint-Gobain Performance Plastics Corporation, defendants. The matter is being filed in the United States District Court, District of Vermont, and our deposition today is being held at the offices of

Page 6 1 BarrSternberg Moss Silver & Munsom, P.C. 2 are located at 507 Main Street, Bennington, 3 Vermont, 05201. My name is Mati Kiin, certified legal 4 5 video specialist, representing the firm of 6 Veritext, New York, and I am the videographer. 7 Our court reporter is Beth Gaige, who is also 8 representing Veritext. I am not authorized to administer an 9 10 oath, nor am I related to any party in this 11 action, nor am I financially interested in the 12 outcome. 13 Counsel and all present in the room will 14 now state their appearances and affiliations 15 for the record, and if there are any 16 objections to the proceeding please state them 17 at the time of your appearance. And now 18 beginning with the noticing attorney. 19 MR. LAFATA: Good morning. My name is 20 Paul LaFata. I'm from Ouinn Emanuel and 21 represent Saint-Gobain. 22 (Off-the-record colloquy.) 23 MR. WILLIAMS: Nathan Williams of Quinn 24 Emanuel for defendant. 25 MR. SILVER: David F. Silver for the

		Page 7
1		plaintiff.
2		MS. JOSELSON: Emily Joselson for the
3		plaintiffs.
4		THE VIDEOGRAPHER: Thank you. I will now
5		ask our notary to swear in the witness.
6		(The Witness was administered the oath.)
7		LINDA CRAWFORD, having been duly sworn by the
8		Notary Public, was examined and testified as
9		follows:
10		DIRECT EXAMINATION
11		BY MR. LAFATA:
12	Q.	Would you please state your full name for the
13		record?
14	A.	Linda Crawford.
15	Q.	And have you previously gone by any other
16		name?
17	A.	Yes.
18	Q.	What are those?
19	A.	Linda Waite and Linda Herrick.
20	Q.	Would you spell Waite?
21	A.	W-a-i-t-e.
22	Q.	Would you please spell Herrick?
23	A.	H-e-r-r-i-c-k.
24	Q.	Thank you very much.
25		And what is your date of birth?

Page 8 1 9/19/1947. Α. 2 Q. And have you ever been deposed before or given 3 testimony before? No. 4 Α. 5 This is your first time? Ο. 6 Α. Yes. 7 All right. Well, I will be asking some Q. 8 questions during the deposition, and you will 9 be providing the answers. You probably heard 10 that Beth Gaige, the court reporter, will be 11 typing down what we say. 12 Yes. Α. 13 Q. You understand that? 14 Α. Yes. 15 Q. And because there is going to be a record on 16 paper, we have to say our answers out loud. 17 So if you nod or shake your head, it won't be 18 on the record. So just make sure you answer 19 the questions verbally, okay? 20 Yes. Α. 21 And if I say something that you don't Ο. 22 understand or a question that's not clear to 23 you, please let me know. All right? 24 Α. Yes. 25 0. If we need to take a break during the

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Page 9
 1
          deposition, that will be fine, so long as we
 2
          don't have a question pending. All right?
 3
      Α.
          Yes.
16
                    (Off-the-record colloquy.)
17
                (Deposition Exhibit No. 1 was marked for
18
          identification.)
19
          BY MR. LAFATA:
20
          Mrs. Crawford, I am handing you a copy of
      Q.
21
          Exhibit 1.
22
               Have you seen this before? Go ahead and
23
          flip through it.
24
               MS. JOSELSON: I don't think we gave
25
          her a copy.
```

Page 10 1 I don't believe -- no, I don't believe I have 2 seen this. BY MR. LAFATA: 3 I am sorry. What was you answer? 4 Q. 5 Α. No, I don't -- I have not seen this. 6 0. That's fine. Now is the first time you have 7 seen it? 8 Yes. Α. 9 Okay. What, if anything, did you do to Q. 10 prepare for today's deposition? 11 I read through the discovery documents that I Α. 12 had provided to counsel. That's about it. 13 Q. Okay. When did you do that? 14 Oh, off and on for a couple weeks. Α. 15 Q. All right. And do you recall what you looked 16 through? 17 Α. Oh, I read the facts of the case. I read 18 about PFOA. I reviewed my house assessments. 19 I reviewed some of the repairs we have done to 20 the house. 21 Thank you. Is that about it? Q. 22 Α. That's about it. 23 Do you recall looking through, in preparation Ο. 24 for today's deposition, any prior deposition

testimony by anybody?

25

Page 11 1 Α. No. 2 Q. Do you prefer to go by Ms. Crawford or Mrs. 3 Crawford? Mrs. Is fine. 4 Α. 5 Okay, Mrs. Crawford. 0. 6 Are you currently employed, Mrs. 7 Crawford? 8 Α. No. 9 When were you last employed? Q. 10 Α. 2010. 11 Where did you work in 2010? Ο. 12 Α. The Vermont Veterans' Home in Bennington. 13 Q. What was your job there? 14 Α. I worked in the social service department and 15 I was the admissions coordinator for much of 16 that time. 17 Q. What were your responsibilities as the admissions coordinator? 18 19 Somebody would make an inquiry or an Α. 20 application to either be admitted to the vet's 21 home or have a family member admitted to the 22 vet's home. My job was to assess their 23 medical condition. If we could meet the needs 24 of that person, if that person had something that required isolation, things like that, to 25

Page 12 1 make sure they fit in well and we could 2 provide for their needs. 3 0. What do you mean by isolation? Well, if they had something contagious. 4 Α. 5 Ο. Like the flu or? 6 Α. Yeah, like the flu or even, you know, 7 Something like that. shingles. 8 Okay. When you assess the medical condition Q. 9 of people who speak to you, do you do that 10 over the telephone or in person or how do you 11 do that? 12 Usually it starts by a phone call; then I go Α. 13 meet the person, be it at home or in a 14 hospital; then I collect the appropriate data, 15 lab work, things like that. 16 About how often would you meet someone in the 0. 17 hospital for this purpose? 18 Four times a month. Α. 19 Would they ever come in to see you? Q. 20 Α. Oh, yes. Yes. 21 And what were some of the medical reports you Ο. 22 would look through for a patient like this? 23 What are some examples? 24 A. Their history, their current illness, lab work, x-rays, physicians' notes. 25

Page 13 And would you make a decision whether to admit them or not based on this information? It was more complicated. We had an Α. No. admissions committee; that I had to present this case to other members of the staff, and we would all vote to see if we could meet their needs. How many people are cared for in this facility Q. during this time? Oh, wow. I don't recall. Α. How many people are on the admissions 0. committee? Α. Five. And what were there -- what were the -- let me rephrase this. What sort of people were on the admissions committee, like physicians or nurses, anything like that? The director of nursing, another RN, a Α. dietitian, physical therapist, and myself. Was this an inpatient facility? Ο. Α. Yes. And when did you start working at the Vermont 0. Veterans' home?

Α.

1987.

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Page 14 1 Did you work there continuously from 1987 to 2 2010? 3 I did. Α. Why did you retire in 2010? 4 Q. 5 Α. Burnt out. Tired. 6 0. Do you feel better now? 7 Α. Much. 8 Did you have any other job responsibilities Ο. 9 during that period aside from being the 10 admissions person? 11 I offered one-on-one counseling. We had Α. 12 a policy to always sit with someone who was passing away if they had no family, so I would 13 14 participate in that. 15 I helped people do Medicaid applications, 16 apply for VA benefits and respond to anything 17 going on, like if somebody was in crisis. You mean a medical crisis? 18 Q. 19 No, more of an emotional crisis. Α. 20 What sort of counseling might you provide Q. 21 during this period? 22 Well, our clientele is mostly elderly, and Α. 23 sometimes we would have the elderly sick 24 person but their spouse would pass way. I'll 25 just do the basic support, sit and talk to

		Page 15
1		them, things like that.
2	Q.	During this period, did you ever prescribe
3		medications?
4	A.	No.
5	Q.	Were you ever licensed to prescribe
6		medications?
7	A.	No.
8	Q.	Did you ever administer medication?
9	A.	Yes, not as a social worker but as an RN
10		previously.
11	Q.	Did you ever administer intravenous
12		medications?
13	A.	Yes.
14	Q.	Oral medications?
15	A.	Yes, but not at the vet's home, at my previous
16		job.
17	Q.	At the vet's home, did you administer oral
18		medications?
19	A.	No.
20	Q.	Any other routes of administration during that
21		period did you administer medications?
22	A.	No.
23	Q.	Did you take blood during your work at this
24		facility?
25	A.	No.

Page 16 1 Did you perform any x-rays? Q. 2 Α. No. 3 Any radiology testing? 4 Α. No. 5 During your work at Vermont Veterans' Home, Ο. 6 did you do any laboratory work? 7 No. Α. 8 Where you did you work before the Vermont Q. 9 Veterans' Home? 10 Southwestern Vermont Medical Center. Α. 11 When you did start at the Southwestern Vermont Q. 12 Medical Center? 13 Α. 1977. 14 And when did you leave that facility? 15 Α. 1986. 16 You then went from the Southwest [sic] Vermont 0. 17 Medical Center to the Vermont Veterans' Home? 18 Α. Not immediately, but yes. 19 What did you do between those periods? 24 Q. What was your job at the Southwest Vermont 25 Medical Center?

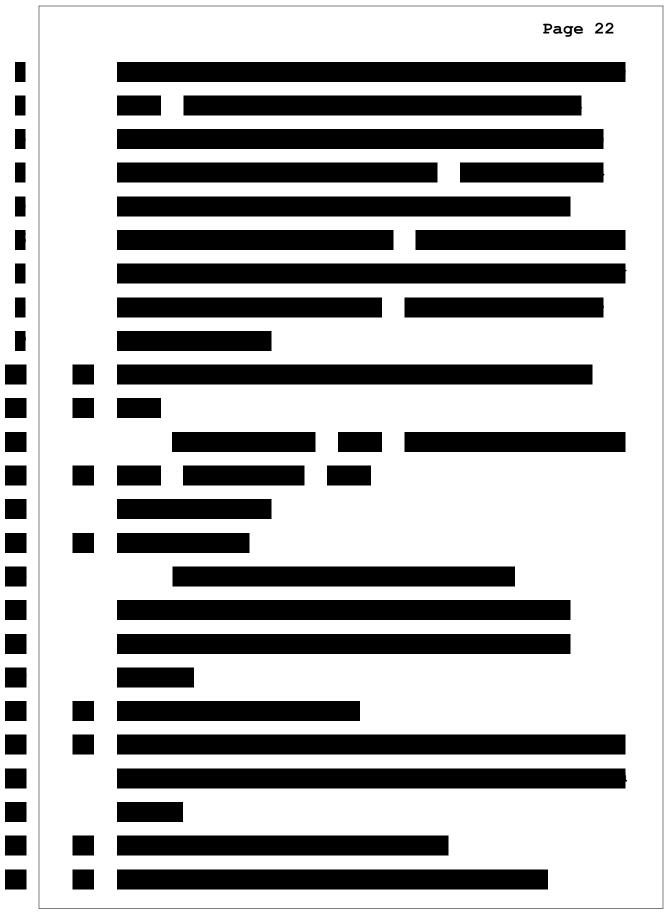
Page 17 1 I was a registered nurse. Α. 2 Q. And what was your responsibility -- your job 3 responsibilities at the Southwest Vermont Medical Center? 4 5 Whatever was assigned. Some days I gave Α. 6 medications. Some days I did bedside nursing. 7 What is bedside nursing? Q. 8 We did everything. We did bed baths. I made Α. 9 the bed, got them up for exercise, fed them, 10 if needed, made sure they ate if they could 11 feed themselves. I would just generally be 12 there for them, respond to their needs. 13 Q. Did you administer prescription medication as 14 a nurse at this facility? 15 Α. Yes. 16 What were the routes of administration that 0. 17 you administered the medication? 18 Oral, IM, subq, IV, per tube, per g-i tube. Α. 19 What is IM? Ο. 20 Α. Intramuscular, a shot. 21 Ο. Mm-hmm. Did you prescribe any medications 22 during your work at this facility? 23 No. Α. 24 Did you administer any radiology testing Q. 25 during your work at this facility?

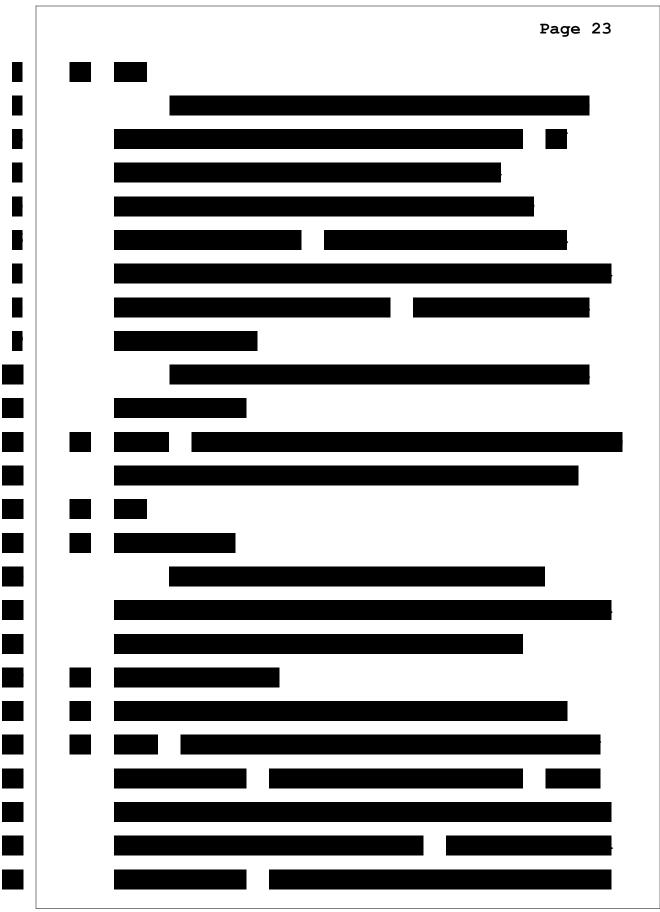
Page 18 1 Α. No. 2 Q. Any x-ray testing? 3 Α. No. 4 Did you perform any lab work during your work Q. 5 at this facility? 6 Α. No. 7 Have you ever performed lab work? Q. 8 Α. No. 9 Ο. That's easier. 10 Why did you leave the Southwest Vermont Medical Center in 1986? 11 15 Q. Did you get care for your back? 16 Α. Yes. 17 What sort of care did you get? Q. 18 Α. Physical therapy. 19 Did that help your back? Q. 20 Α. With time, yes. 21 Where did you work before the Southwest Q. 22 Vermont Medical Center? 23 I worked at a hospital. It's now closed. Α. 24 Mary McClellan Hospital in Cambridge, New 25 York.

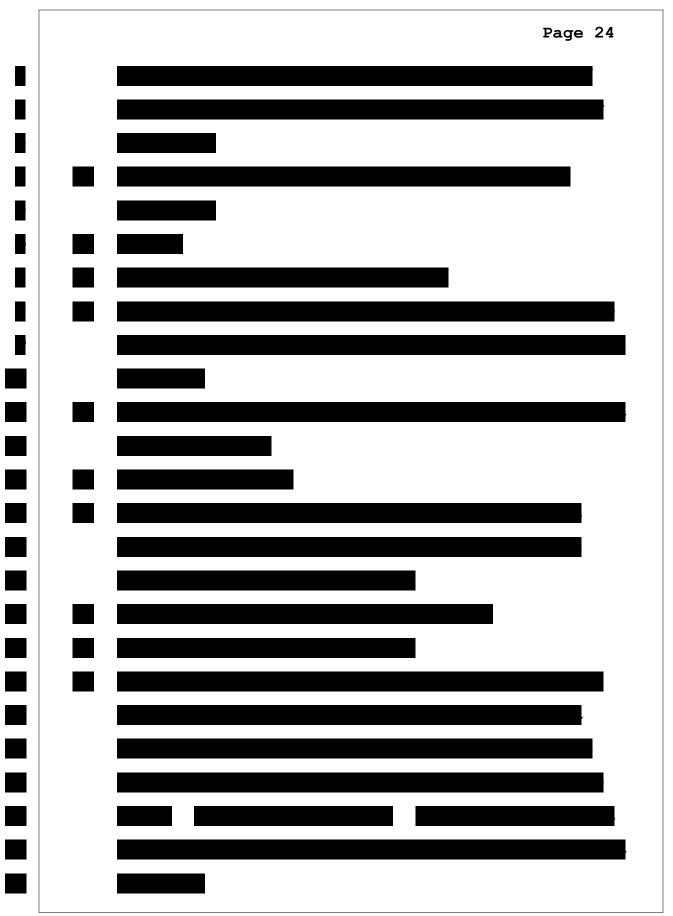
Page 19 1 Would you please repeat the name? Q. 2 Α. Mary McClellan. But I worked there very 3 briefly. When did you work there? 4 Q. 5 Α. 70 -- 75. No, '74 to '75. 6 0. What were your responsibilities at -- is this 7 a hospital? 8 Α. Mm-hmm. 9 Q. And what was your responsibilities at this 10 hospital? 11 Medication nurse. Α. 12 What would -- what would that entail? Q. 13 Α. Giving ordered medications. 14 Would you sometimes, when giving medications Ο. 15 at any of these facilities, need to consult 16 the Physicians Desk Reference? 17 Α. Occasionally. 18 Do you currently have an active nursing Q. 19 license? 20 Α. No. 21 When did that become inactive? Ο. 22 Α. 2012. 23 When did you obtain your nursing license? Ο. 24 1974. Α. 25 Q. Was there a period of time between when you

		Page 20
1		left the Mary McClellan Hospital in New York
2		and then started working for the southwest
3		Vermont Medical Center?
4	A.	Yes.
5	Q.	What did you do during that period?

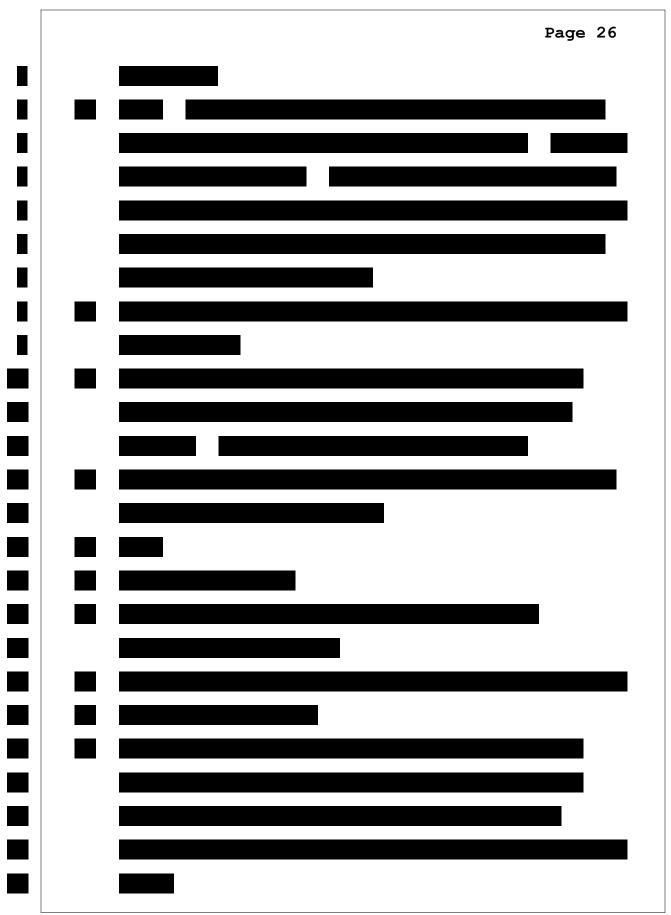
Page 21 2 Where did you work before the Mary McClellan Q. 3 Hospital in New York? I did not work. 4 Α. 5 Q. This was your first professional job? Mm-hmm. 6 Α. 7 Is that a yes? Q. 8 Α. Yes. 9 Q. That's all right. 10 Other than your nursing license, have you 11 ever held any other licenses for work? 12 Α. No. 13 Q. In any of these positions, have you ever filed 14 any claim for workers' compensation? 15 Yes. Α. 16 What was the first one you recall filings? Q.

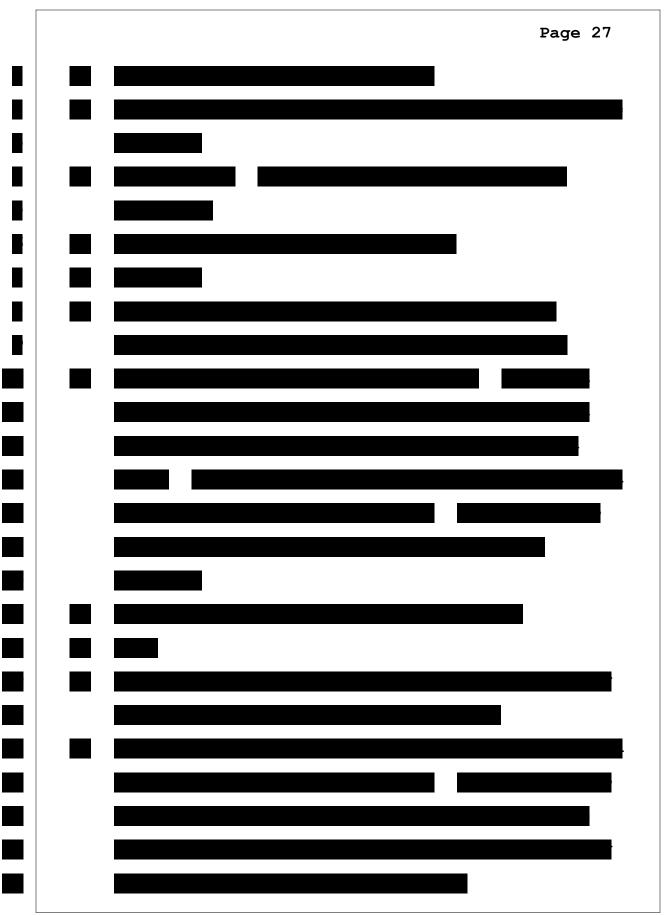


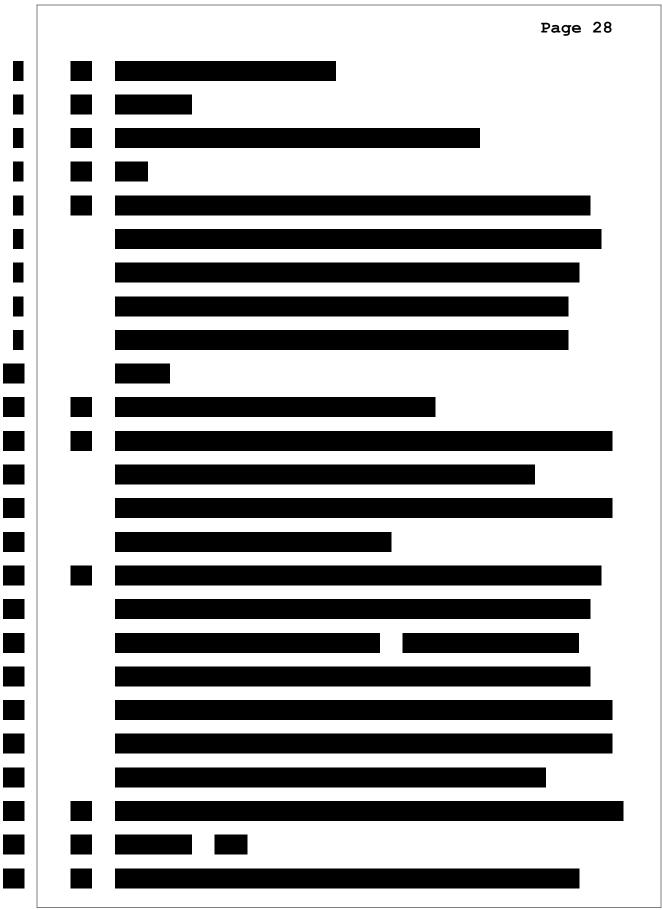








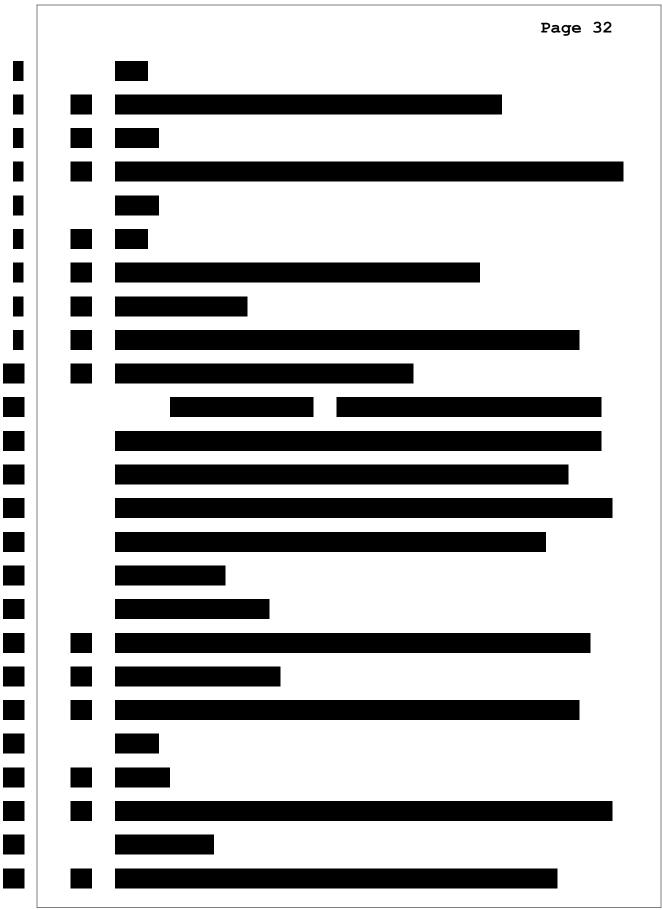




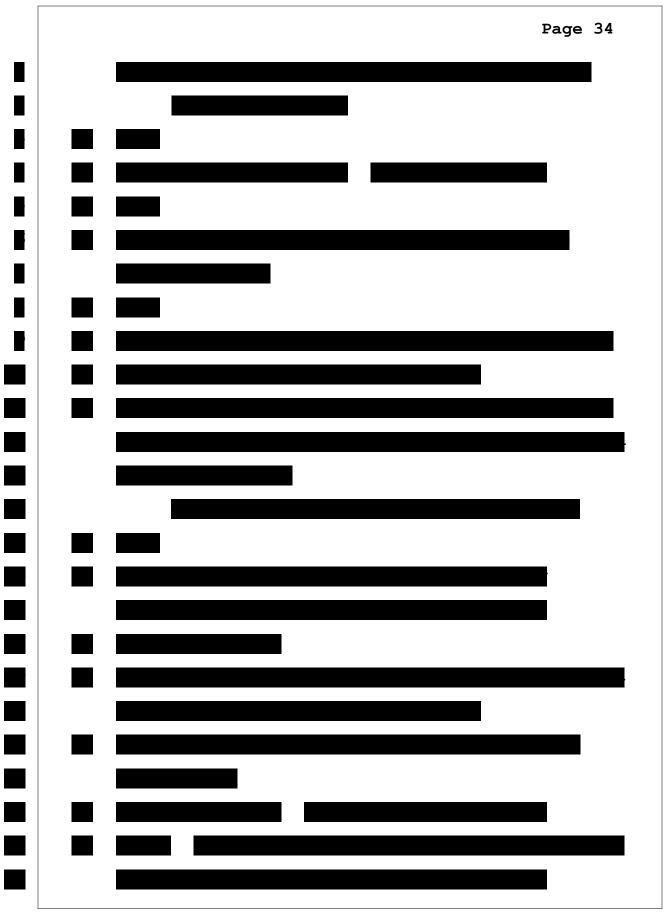
		Page 29
6		(Deposition Exhibit No. 2 was marked for
7		identification.)
8	Q.	Mrs. Crawford, you have a copy of Exhibit 2 in
9		front of you.
10		Do you see at the top it says incident
11		report?
12	A.	Mm-hmm.
13	Q.	Is this the type of incident report that you
14		referenced today?
15	A.	Yes.
16	Q.	Do you see toward the bottom there's a
17		signature?
18	A.	The very bottom?
19	Q.	Mm-hmm.
20	A.	My signature, yes.
21	Q.	That's your signature?
22	A.	Yes.
23	Q.	And this was dated May 18, 1990.
24		Do you see that?
25	A.	I do.

		Page 30
1	Q.	Did you fill this out or did someone fill it
2		out?
3	A.	I filled it out.
4	Q.	Okay. Would you please read your handwriting
5		on the description of the incident for the
6		record?





		Page 33
3		(Deposition Exhibit No. 3 was marked for
4		identification.)
5	Q.	Mrs. Crawford, you have a copy of Exhibit 3 in
6		front of you.
7		Do you see at the top it says incident
8		report?
9	A.	Yes.
10	Q.	Do you see at the bottom there's a signature?
11	A.	Yes.
12	Q.	Is that your signature?
13	A.	Yes.
14	Q.	Do you see it's dated December 19, 1991?
15	A.	Yes.



Page 35 7 Q. Is this the first case in which you have been involved in a lawsuit? 8 9 Α. Define lawsuit. 10 Q. Suing somebody. 11 Myself and the other women that were affected Α. 12 did seek counsel about harassment at work. 13 Q. Did you file a lawsuit against the state or 14 your employer for the harassment? 15 Α. Well, yes. Yes. 16 When did you do that? 0. 17 Α. I can't recall. 18 Q. What was the harassment that you were suing 19 for? 20 Α. The perfume. 21 What was the outcome of that lawsuit? Ο. 22 Α. We reached a settlement -- a settlement from 23 the state, and the -- and a perfume policy 24 went into effect. 25 Did the settlement result in paying you money Q.

		Page 36
1		for the harassment claim?
2	A.	Yes.
3	Q.	And what was that?
4		MS. JOSELSON: Objection. Relevance.
5		You can answer.
6	A.	I don't recall a specific it wasn't a lot,
7		I know that.
8		BY MR. LAFATA:
9	Q.	And there were other were they all women
10		who sued together?
11	A.	Mm-hmm.
12	Q.	Were those coworkers?
13	A.	Yes.
14	Q.	Did you give any testimony with that lawsuit?
15	A.	No.
16	Q.	Did you sit for a deposition like this with
17		that
18	A.	No. No.
19	Q.	Other than the suit against the state for
20		harassment, have you ever been and in this
21		case have you been involved in another
22		lawsuit before?
23	A.	No.
24	Q.	Ms. Crawford, because of the nature of the
25		claims in this case, there are some questions

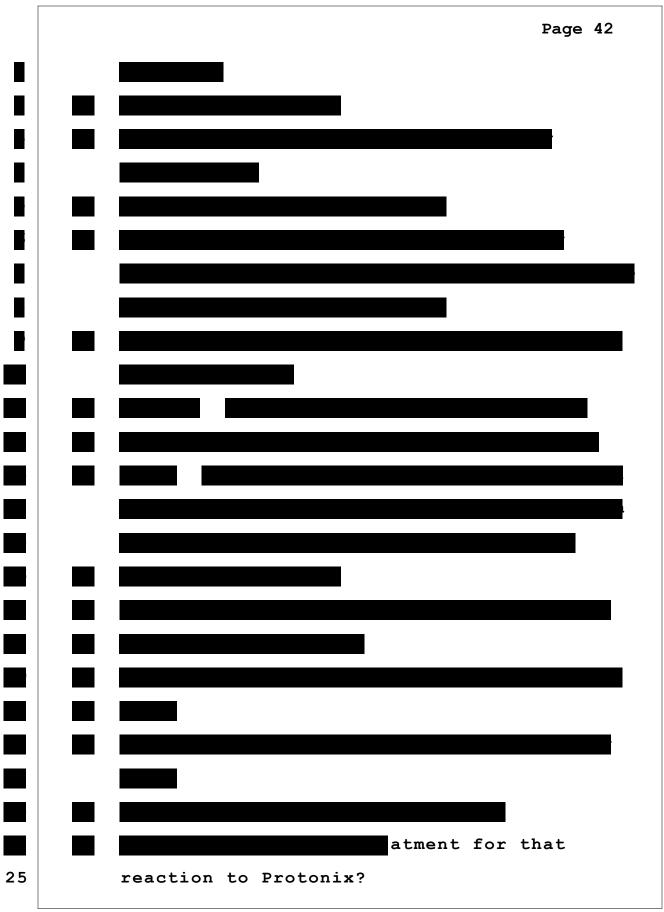
Page 37 1 I want to ask about some medical information 2 that would not be the type of questions that 3 you might have around the dinner table. So it's not to be nosey but it's really the 4 5 nature of the claims in this case. Do you understand? 6 7 Α. Yes. MS. JOSELSON: I'm going to object to the 8 9 characterization of that, but you can answer 10 those questions that you can. BY MR. LAFATA: 11

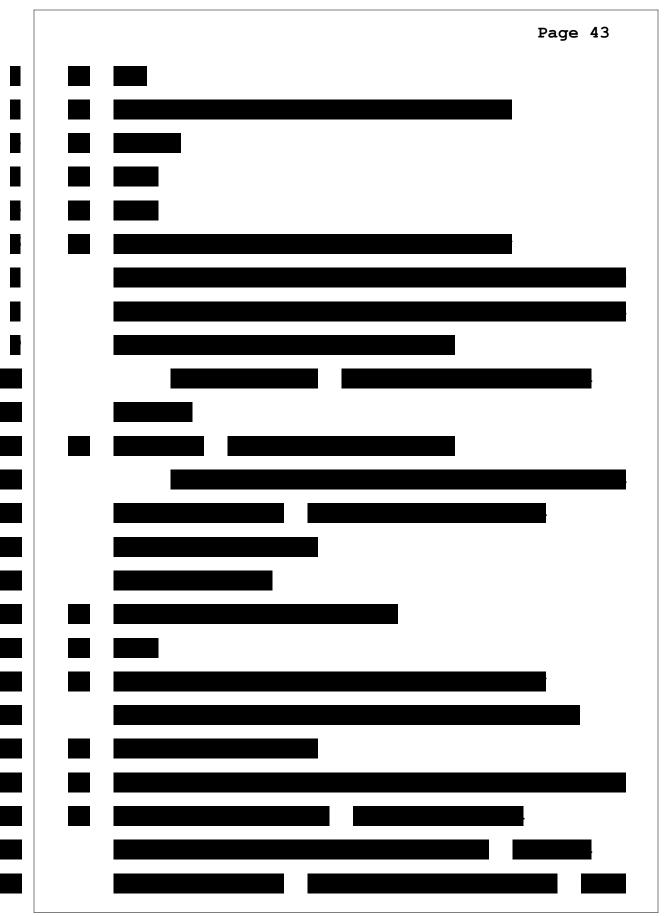


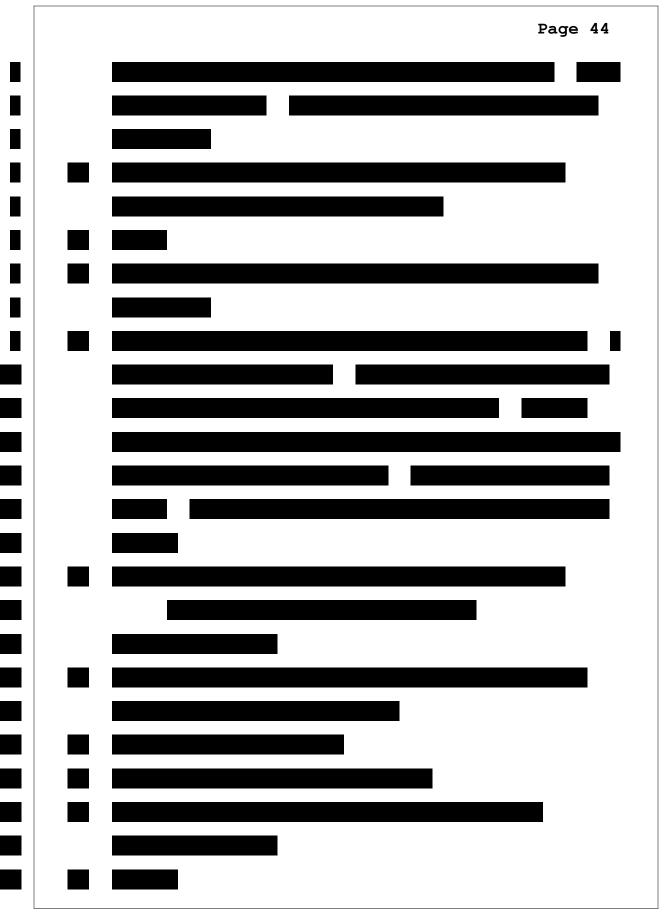


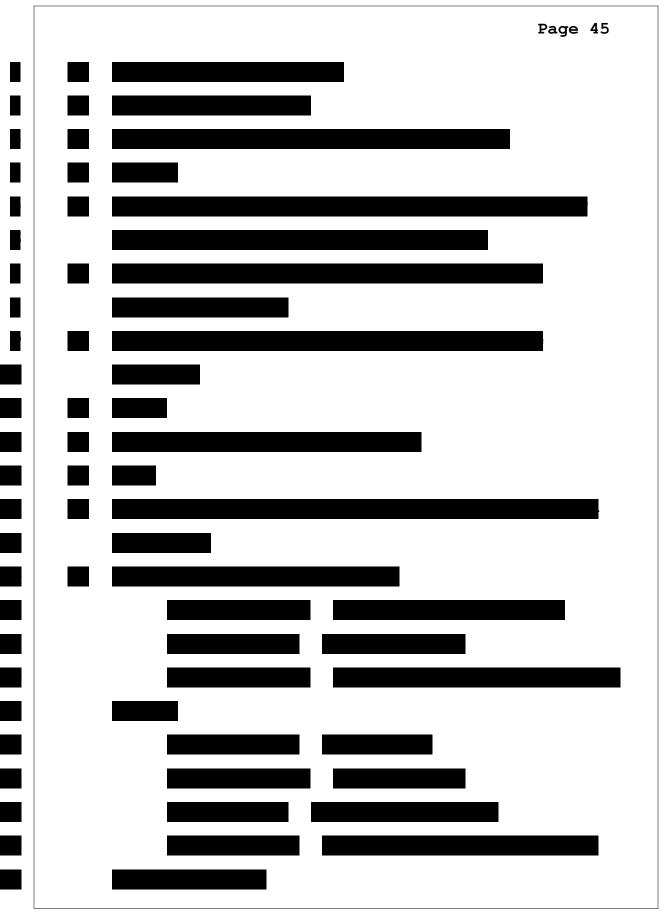


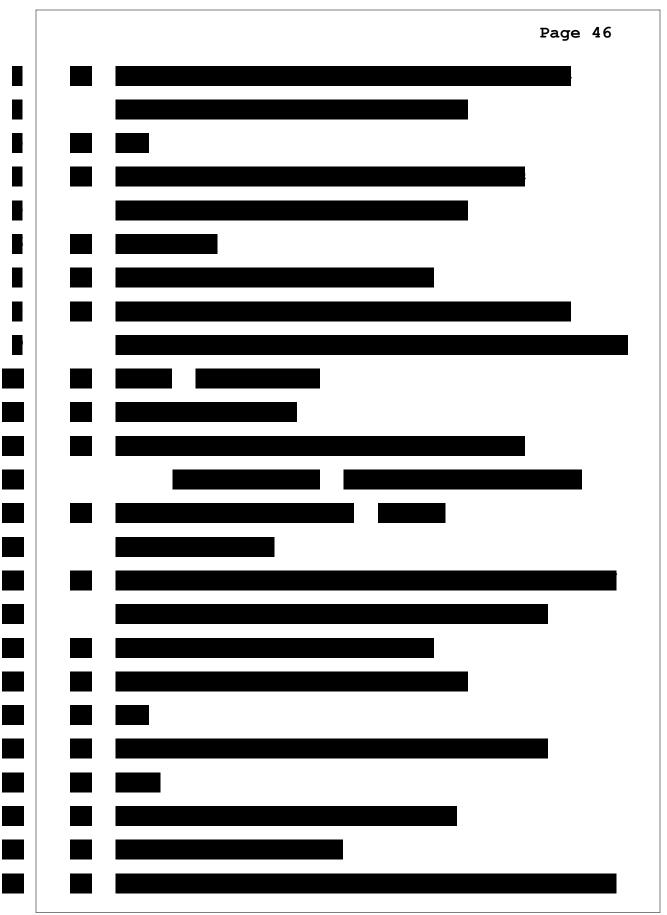


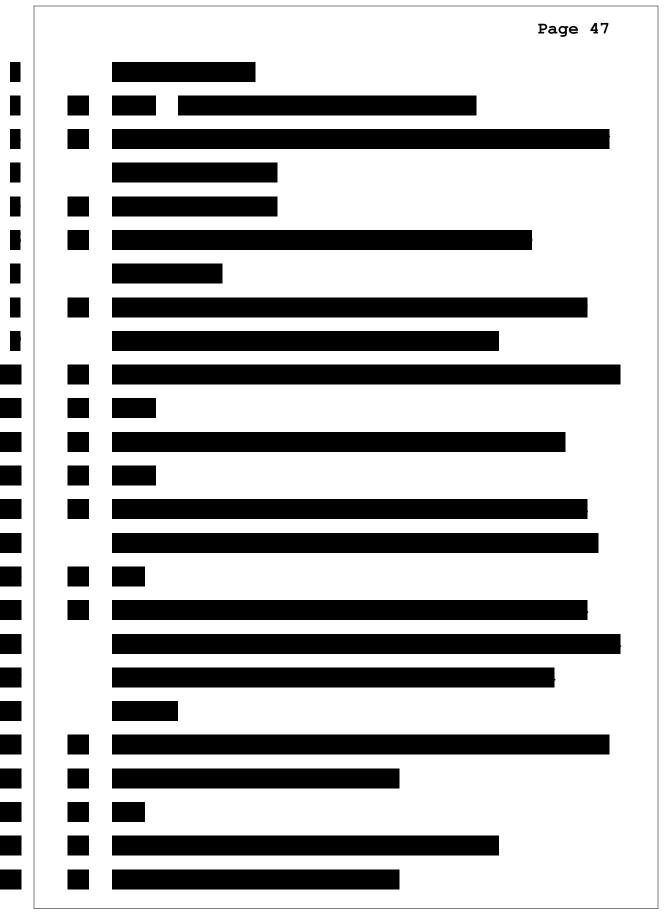




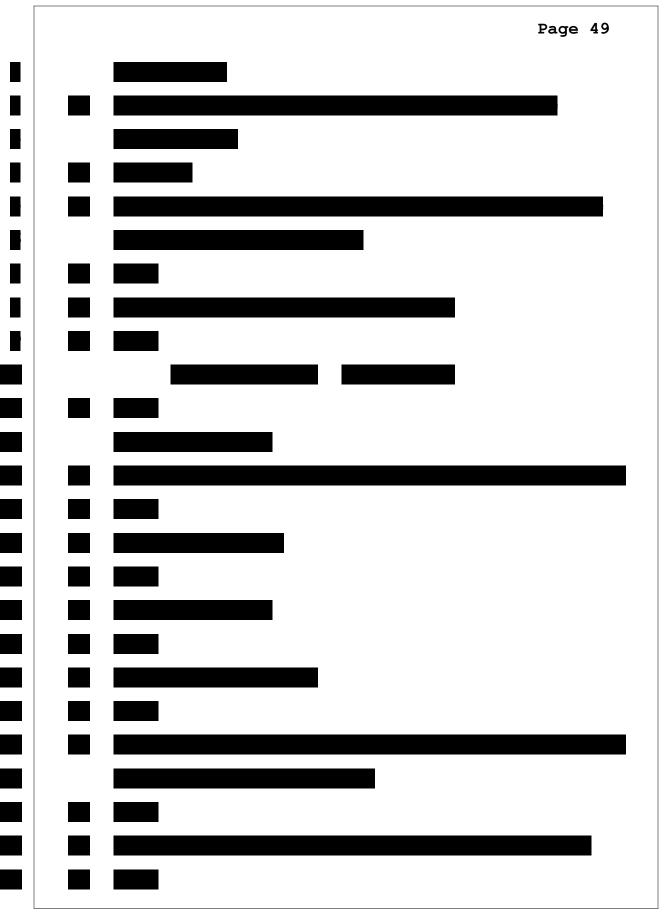








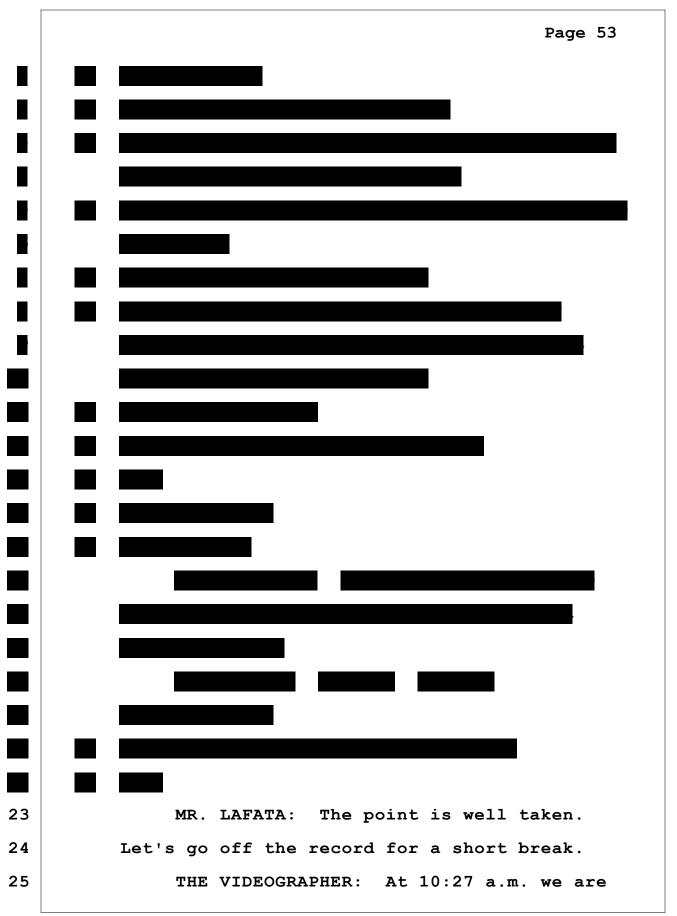












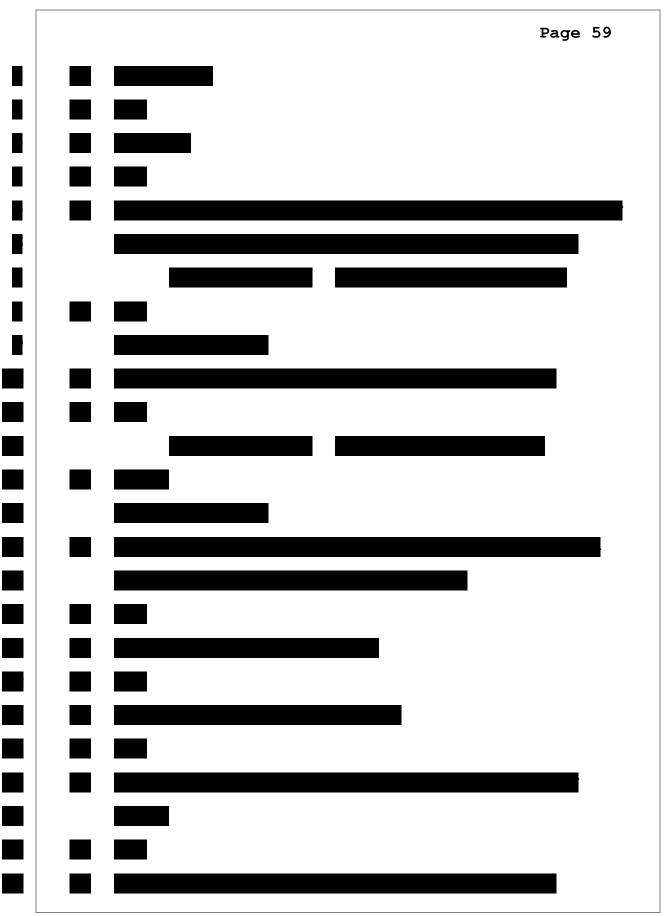
		Page 54
1		going off the record.
2		(Brief recess taken.)
3		(Deposition Exhibit No. 4 was marked for
4		identification.)
5		THE VIDEOGRAPHER: At 10:45 a.m. we're
6		back on the record.
7		BY MR. LAFATA:
8	Q.	Mrs. Crawford, are you ready to continue?
9	A.	I am.













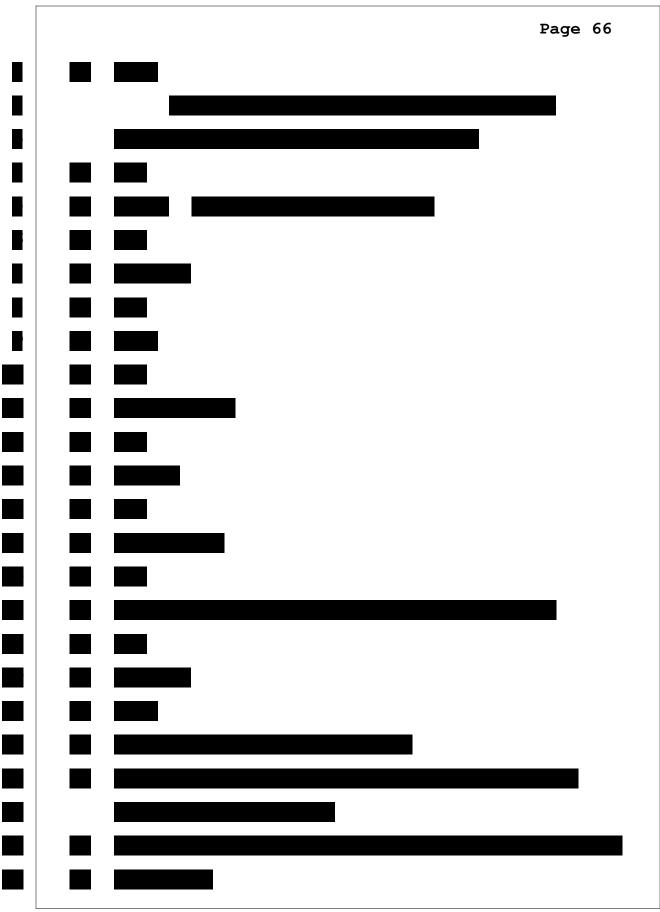


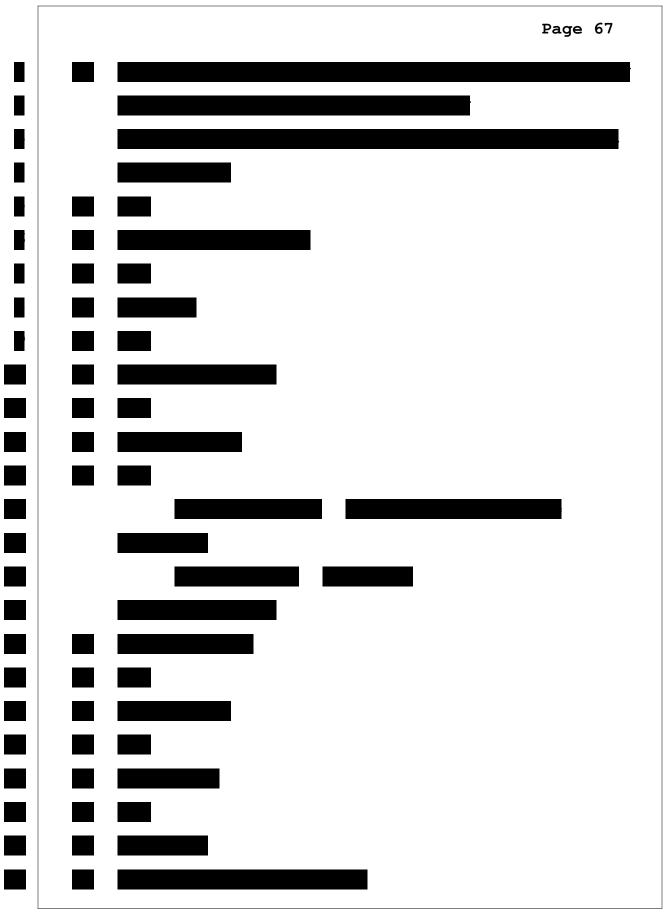


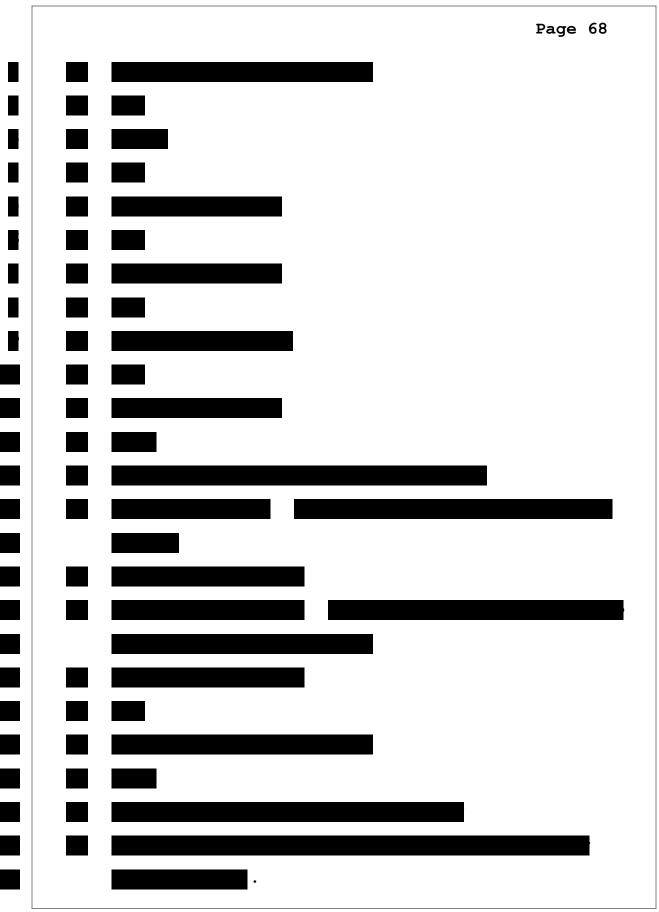


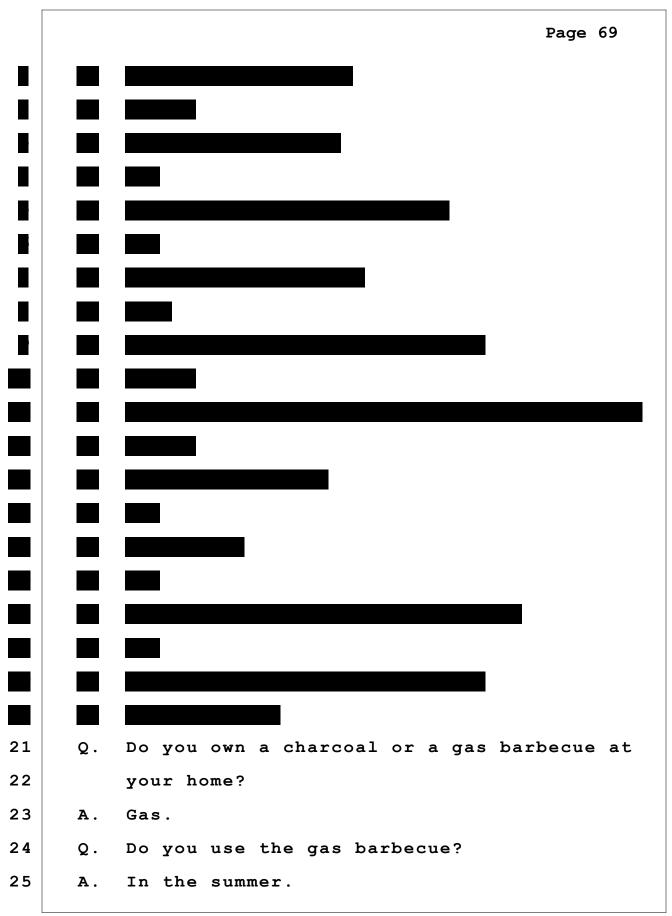




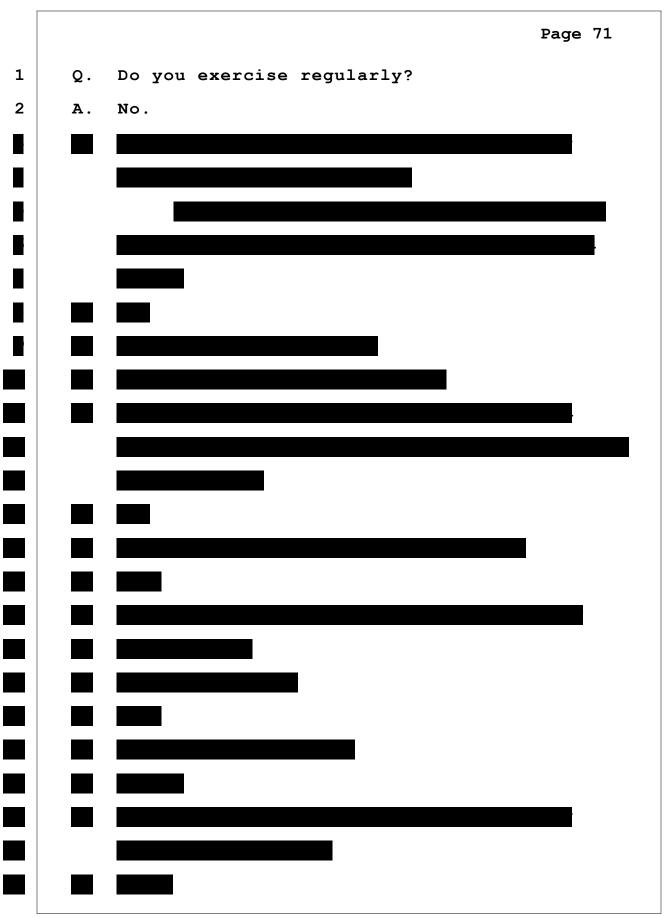


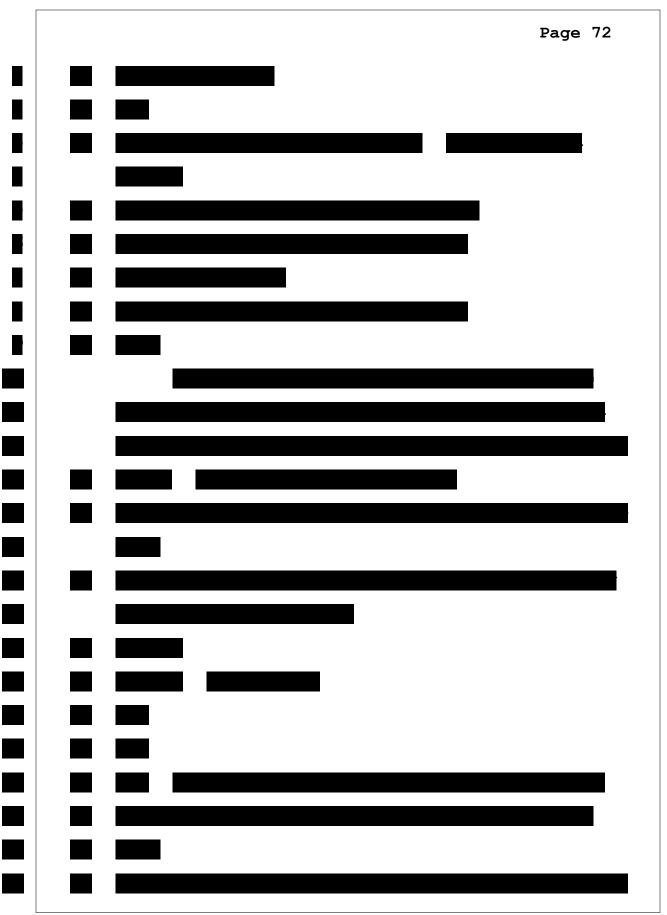






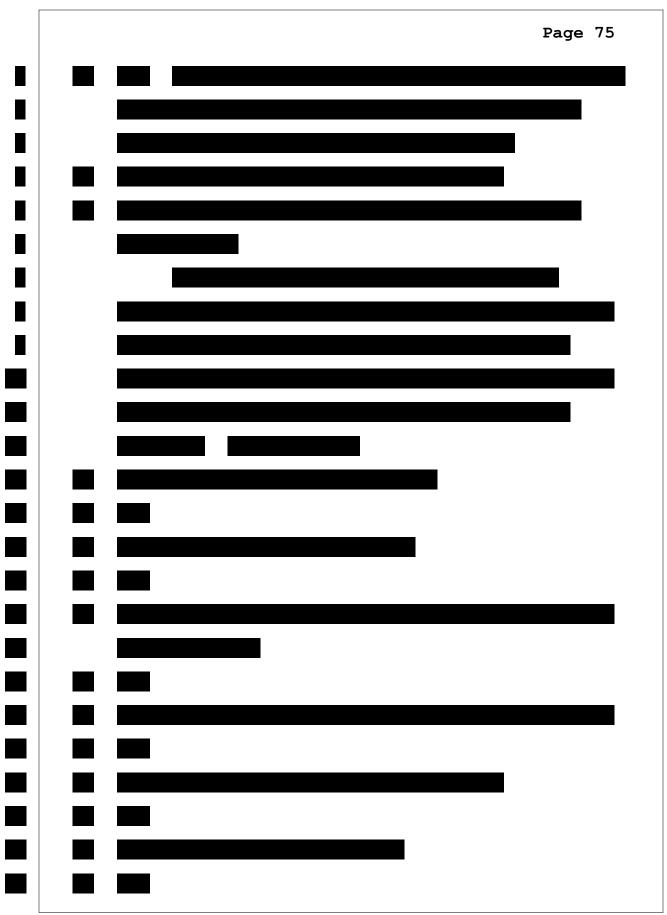
Page 70 1 What sort of things do you barbecue? Q. 2 Α. Chicken, beef. 3 About how often would you barbecue chicken or Q. 4 beef? 5 Maybe once a week. Α. Pork, do you use the pork on the barbecue? 6 Q. 7 Α. No. What about sausage or frankfurters? 8 Q. 9 Α. I don't eat that, no. 10 Okay. Do you barbecue hamburgers? Q. 11 Α. Yes. 12 Q. Steak? 13 Α. Yes. 14 Fish? Ο. 15 Α. No. 16 Ο. No? Don't like fish? 17 Α. No. 18 Do you barbecue vegetables? Q. 19 Α. No. 20 Do you eat them raw? Q. 21 Α. Usually, yes. 22 Q. Or steamed? 23 Α. Mm-hmm. 24 Q. Yes? 25 Α. Yes.

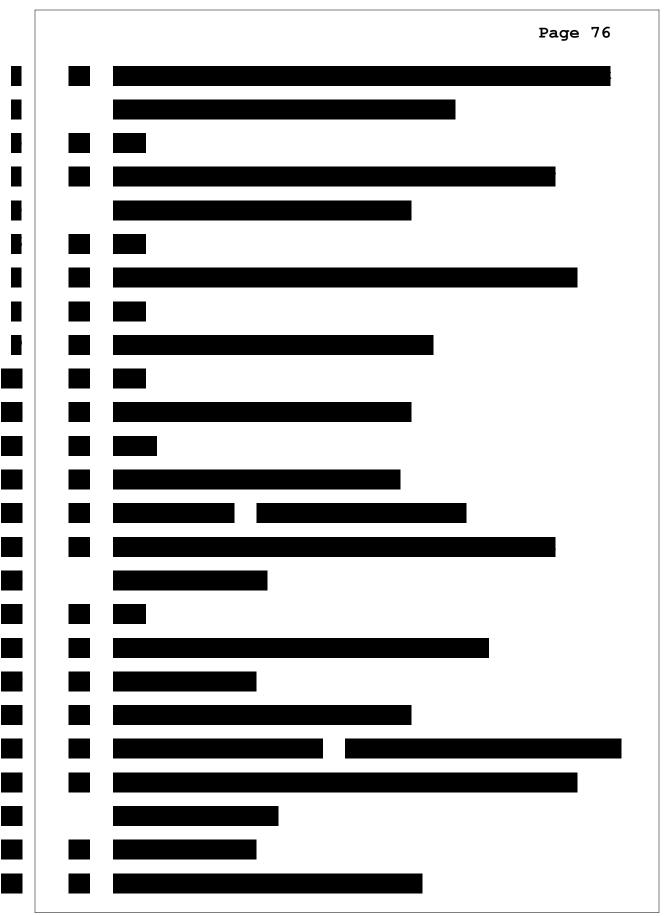


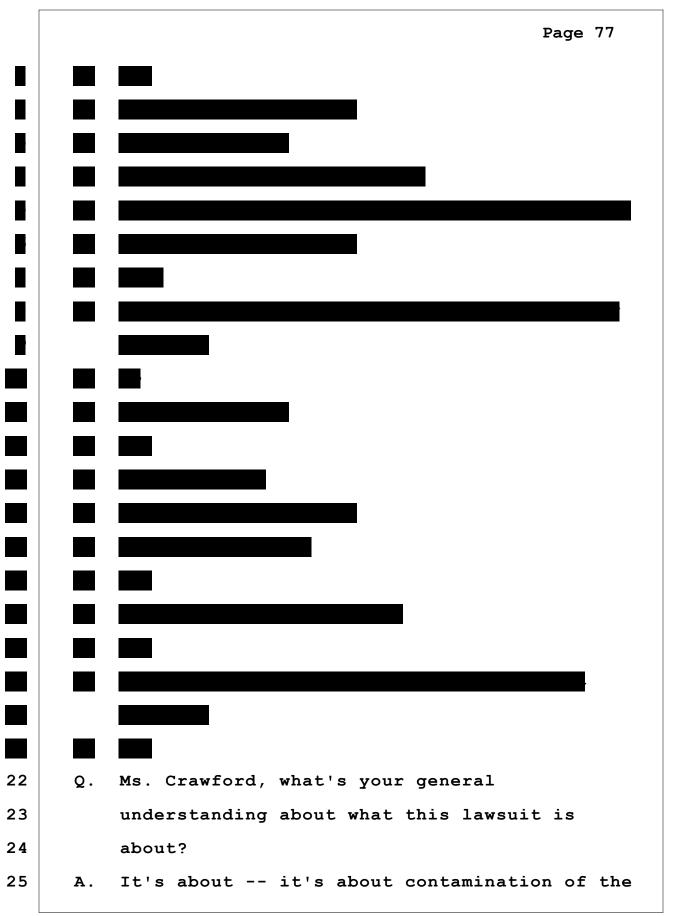












Page 78 1 soil, the water, the aguifer, the surface 2 water, by PFOA. 3 0. Contamination by whom? Saint-Gobain. 4 Α. 5 What's your general understanding about what 0. 6 you think Saint-Gobain did wrong in this case? 7 Α. Well, they were using PFOA, a manmade 8 chemical, in their manufacturing process, and it's alleged that they disposed of the waste 9 10 products from that which contained PFOA and 11 not the correct way. It was dumped onto the 12 ground. It was put into the air by the 13 smokestacks. It was stored improperly. 14 And what's your general understanding about Ο. 15 the relief that you are seeking in this case 16 for those things? 17 Α. We want safe water to drink, so we need to be 18 hooked up to the municipal water. 19 My house and the houses of all those in 20 the state-defined zone of contamination have 21 lost value. We're all upset thinking that our 22 house is sitting on top of a contaminated 23 aquifer. 24 We are concerned about the need for 25 medical monitoring because we understand that

Page 79 1 you can be exposed to a toxic chemical and it 2 can be latent in your body for years and then 3 all of a sudden you have cancer. So we believe we need medical monitoring by experts. 4 5 Anything else? Q. 6 Α. Could you repeat the original question? 7 Yeah. What's your general understanding about Q. 8 the relief you are seeking in the case? 9 You went through a number of things. I 10 want to make sure I got your understanding. 11 I think people need to be compensated for the Α. 12 distress and the damage to their homes and 13 their bodies. 14 Anything else? Ο. 15 Α. Not that I can think of right now. 16 You used a phrase, zone of contamination. 0. 17 What is that? 18 That's an area in Bennington and North Α. 19 Bennington that the State of Vermont has 20 determined has been contaminated by PFOA that 21 came from ChemFab. 22 Do you understand this to be a -- what's Q. 23 called a class action case? 24 Α. Yes. 25 0. You heard that phrase?

Page 80 1 Α. Yes. 2 Q. Do you understand that you are being offered 3 as a representative of a class? Yes. 4 Α. 5 What is your understanding in general about Ο. 6 your duties as a representative of the class? 7 My duties is to gather all the documentation Α. 8 that we needed for discovery, to meet with the 9 counsel, to just represent everybody in a 10 fair, equal way. 11 Anything else? Q. 12 Α. Not that I can think of now. 13 Q. When did you first learn about PFOA? 14 I think it was the summer of '16. Α. 15 Q. Where were you when you first heard about 16 PFOA? 17 Α. Home. 18 How did you first hear about it? Q. 19 The paper. Α. 20 Q. Which paper? 21 Α. The Bennington Banner. 22 Q. Do you recall what you heard in the paper in 23 the summer of '16 when you first heard about 24 PFOA? 25 You are talking about in Bennington and North Α.

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Bennington?

- Q. When you first heard about it.
- A. Okay. Because I heard about it maybe a little bit before that in Hoosick Falls. So I have friends that live in Hoosick Falls, and, you know, they were talking about PFOA; and I felt kind of superior because I was fine, we didn't have it. And then I read about a man in North Bennington who was concerned and got a well tested, either his or his family's, and it was positive for PFOA.

So then the state got involved, started testing wells, and they kept expanding the zone of contamination. I think one of the workers from the state said that they kept testing wells. They would get a positive reading. They would move the boundary a little farther. And their plan was to keep moving it until they didn't find any PFOA, and they kept moving it until my house was included.

- Q. So was the first time that you heard about PFOA from some friends of yours in Hoosick Falls, New York?
- A. Probably a few months before it hit

Page 82 1 Bennington. 2 Q. And where were you when you first heard about 3 PFOA from your friends in New York? Probably the grocery store. That is where I 4 Α. 5 see all my friends. What was the sum and substance of what you 6 0. 7 talked about? 8 MS. JOSELSON: If you recall. I don't recall exactly, but I know they were 9 Α. 10 very upset. BY MR. LAFATA: 11 12 What do you recall that they said, if Q. 13 anything? 14 That they just were scarred and they didn't Α. 15 know what was going to happen. 16 Who were they? 0. Oh, God, I don't recall. 17 Α. 18 Q. Where was the grocery store? 19 Bennington. Α. 20 After you heard about PFOA -- what is -- let Q. 21 me rephrase it. 22 Do you know what PFOA stands for? 23 Α. Perfluorooctanoic something. 24 Okay. Have you ever spoken to any of your Q. 25 physicians about PFOA?

Page 83 1 Α. Yes. 2 Ο. Which ones? 3 Dr. Carroll. Α. Any others? 4 Q. 5 Α. No. 6 0. What did you talk about with Dr. Carroll about 7 PFOA? 8 Well, I shared my blood results with him, and Α. 9 it -- you know, he's a family practitioner. 10 He's not an expert. So it's in my chart that 11 I have been exposed to an environmental toxin. 12 And, you know, he's trained to deal with 13 symptoms, so if I am asymptomatic at this 14 point -- he's not doing any extra monitoring. 15 That's why I want medical monitoring by 16 experts that know that these things can be 17 latent for years and years, and then, oh, gee, 18 you've got cancer throughout your whole body. 19 Did Dr. Carroll refer you to an expert? Q. 20 It's all new to him. Α. No. 21 Did Dr. Carroll say whether or not PFOA could Ο. 22 increase your risk of any condition? 23 He didn't want to commit to that. Α. No. 24 Q. Did he say he didn't want to commit to that? 25 Α. No, he didn't. That was my impression.

Page 84 1 Dr. Carroll did not tell you that being Ο. 2 exposed to PFOA could increase your risk for anything, did he? 3 MS. JOSELSON: 4 Objection. 5 He didn't specifically say that, but I know Α. 6 that from reading. 7 BY MR. LAFATA: 8 Did you ask him that? Q. 9 Α. No. 10 You mentioned you had a blood test for PFOA. Q. 11 Who performed the blood test? 12 It was set up by Vermont State Health Α. 13 Department. 14 Did you pay for the blood test? 0. 15 Α. No. 16 How many blood tests did you have for PFOA? 0. 17 Α. One. 18 Where did you have the test performed? Q. 19 Α. At the Department of Health office in 20 Bennington. 21 Did you get the results of the test? Ο. 22 Α. I do. 23 Do you recall what the results were? 0. 24 2.8. Α. 2.8 what, if you know? 25 Q.

Page 85 1 Mic -- I'm not sure if it's micrograms or 2 milligrams. I don't know. 3 Of some unit? Some unit of measurement? 0. Α. Yes. 4 5 Did you take the test results to Dr. Carroll? 0. 6 Α. They were sent to him by the lab that did the 7 testing. 8 Did Dr. Carroll recommend any further blood Ο. test with respect to PFOA? 9 10 He wanted me to just -- you know, I Α. 11 stay -- I will do what the State of Vermont 12 recommends, and that is basically who he knows 13 is monitoring the situation and knows more 14 about it than he does. 15 Have you sustained, do you believe, any Q. 16 medical condition today as a result of PFOA 17 exposure? I have no evidence of that. 18 Α. 19 (Deposition Exhibit No. 8 was marked for 20 identification.) 21 Mr. Crawford, do you see a copy of Exhibit 8 22 in front of you? 23 I do. Α. 24 Flip through this for a second. Do you see a Q.

couple pages here?

25

Page 86 1 Do you see at the top of page one it's 2 dated July 21, 2016? 3 Α. Yes. Do you see it's addressed to you at the top? 4 5 Α. Yes. 6 0. And would you turn with me to the second page? 7 At the top there it says your test results --8 is this the 2.8 you were recalling? 9 Α. Yes. 10 Q. Micrograms per liter in this case? 11 Α. Yes. 12 Do you see the first bullet there says, most Q. 13 people in the U.S. have less than 5.7 14 micrograms per liter of PFOA in their blood? 15 Do you see that? 16 Α. Yes. 17 Do you recall talking to Dr. Carroll or any Q. 18 other doctor about how your PFOA level 19 compares to most people in the United States? 20 No. Α. 21 Would you come back to page one? 22 Do you see there is a second paragraph, 23 what does my test result mean? 24 Α. Yes. 25 Q. Do you see that?

Page 87 1 Mm-hmm. Α. 2 Q. And the next sentence do you see it says, 3 almost everyone in the United States has PFOA in their blood. 4 5 Do you see that? Α. 6 Yes. 7 Do you recall any discussions with Dr. Carroll Q. 8 or any other physician about most people 9 having PFOA in their blood in the United 10 States? 11 No. Α. 12 Do you see two paragraphs down there is a Q. 13 paragraph that starts with it's important? 14 Α. Yes. 15 Q. It says, it's important to know what your test 16 results cannot tell you. 17 Do you see that? 18 Α. Yes. 19 It says, your test result cannot tell you if 20 your exposure to PFOA will cause you health 21 problems in the future or if a condition you 22 have now is caused by this exposure. 23 Do you see that? 24 Α. Yes. 25 Do you recall talking to Dr. Carroll about 0.

Page 88 1 this statement from Vermont? 2 Α. No. 3 Ο. Do you agree with this statement? MS. JOSELSON: Objection. Calls for 4 5 expert opinion. You can answer it if you 6 understand it. 7 I think that's why it's important that we have Α. 8 medical monitoring by experts, people that 9 know what PFA -- PFOA does as it's circulating 10 in your body or depositing in your kidneys and 11 your liver. I think an expert in the field of 12 toxic exposures would know what to look for 13 early, so you get early detection before you 14 did have full-blown cancer or something like 15 that. 16 BY MR. LAFATA: 17 You mentioned earlier that you had your water Q. tested for PFOA. 18 19 Do you recall that? 20 I do. Α. 21 Ο. How many times was your water tested for PFOA? 22 Α. Four. 23 And who did the testing of your water those 0. 24 four times? 25 Α. I don't recall the name of the company. Ι

		Page 89
1		believe it was someone that was contracted by
2		the State of Vermont.
3	Q.	Did you pay for any of the water testing?
4	A.	No.
5	Q.	Do you know where the water was collected on
6		your property for the water testing?
7	A.	Yes.
8	Q.	Where was it collected?
9	A.	Out of my kitchen sink.
10	Q.	Anywhere else?
11	A.	No.
12	Q.	Was any water collected from do you have a
13		well let me withdraw.
14		Do you have a well at your property?
15	A.	Yes.
16	Q.	Was any water collected from your well?
17	A.	No. It's a sealed system.
18	Q.	Do you have any water filter installed on your
19		property?
20	A.	No.
21		(Deposition Exhibit No. 9 was marked for
22		identification.)
23	Q.	All right. Mrs. Crawford, this is copy of
24		Exhibit 9. It's sideways. Okay.
25		Do you see at the top there it says,

		Page 90
1		analytical results perfluorinated chemicals?
2		Do you see that?
3	A.	I do.
4	Q.	And there's handwriting, 643 West Road at the
5		top?
6	A.	Yes.
7	Q.	Is that your address?
8	A.	Yes.
9	Q.	Is that your handwriting?
10	A.	No.
11	Q.	Do you see beneath that there's a date,
12		printed May 3, 2016?
13	A.	Yes.
14	Q.	Do you recall receiving a test result of your
15		water in May of 2016?
16	A.	I do.
17	Q.	And there is a row here, fourth from the top,
18		for PFOA.
19		Do you see that?
20	A.	I do.
21	Q.	And under the result do you see it says ND?
22	A.	Yes.
23	Q.	Do you understand that to mean non detect?
24	A.	I do.
25	Q.	Do you recall receiving a test result of your

		Page 91
1		water in May for non detect for PFOA?
2		MS. JOSELSON: Objection. Asked and
3		answered, but you can answer it again.
4	A.	Yes.
5		BY MR. LAFATA:
6	Q.	And you had your water tested again after
7		this, right?
8	A.	I did.
9	Q.	Let's look at that.
10		(Deposition Exhibit No. 10 was marked for
11		identification.)
12	Q.	Ms. Crawford, do you have a copy of Exhibit 10
13		in front of you?
14	A.	I do.
15	Q.	On the first page, do you see there's a letter
16		from the State of Vermont?
17	A.	Yes.
18	Q.	And it's dated October 10, 2016?
19	A.	Yes.
20	Q.	And it's addressed to Mr. Crawford?
21	A.	Yes.
22	Q.	Do you recall receiving a letter from the
23		State of Vermont in October of 2016 with water
24		test results?
25	A.	Yes.

Page 92 1 Would you turn to the second page, please? 2 Do you see at the top there it says 643 West Road? 3 4 Α. Yes. 5 And is that your handwriting here? 0. 6 Α. No. 7 Do you recognize the handwriting? Q. 8 Α. No. 9 Okay. Do you see beneath the handwriting it Q. 10 says printed September 28, 2016? 11 Α. Yes. 12 Okay. And about four lines down there's a row Q. 13 for PFOA. Do you see that? 14 Yes. Α. 15 Q. And do you see the result says ND? 16 Α. Yes. 17 Q. Do you understand that to mean not detect? 18 Α. Yes. 19 Okay. You had another test after this --Q. 20 Α. Yes. 21 Ο. -- right. 22 (Deposition Exhibit No. 11 was marked for 23 identification.) 24 Q. Mrs. Crawford, you have a copy of Exhibit 11 25 in front of you?

Page 93 1 Α. Yes. 2 Q. Do you see the first page of the letter from 3 the State of Vermont to Theodore and Linda 4 Crawford? 5 Yes. Α. And it's dated June 21, 2017, right? 6 Q. 7 Α. Yes. 8 At the top? And the second page has some test Q. 9 results, right? 10 Yes. Α. 11 And at the top there of the second page it 0. 12 says, sampling point 643 West Road? 13 Α. Yes. 14 That's your address? 0. 15 Α. Yes. 16 And do you see there is a row for PFOA on the 0. 17 chart there? 18 Α. I do. 19 And third from the bottom, do you see the row 20 for PFOA? 21 I do. Α. 22 And you see in the result it says 4.1? Do you Q. 23 see that? 24 Α. Yes. 25 And the unit is nanograms per liter? Q.

Page 94 1 Α. Yes. 2 Q. And then there is some handwriting below this, 3 PFOA 4.1 ppt. Do you see that? Yes. 4 Α. 5 Do you recognize the handwriting? Ο. 6 Α. No. 7 Would you turn back to the first page? Q. 8 Do you see in the second paragraph it 9 starts with CT Male? 10 Yes. Α. 11 It says: CT Male, the consultant for 0. 12 Saint-Gobain, resampled your water supply well 13 following a resampling plan approved by WMPD. 14 Do you see that? 15 Α. Yes. 16 Do you understand the resampling was done by Ο. 17 CT Male, a consultant for Saint-Gobain? 18 Α. Yes. 19 In the paragraph above that, do you see there 20 is a sentence in the middle that starts with 21 lab results? 22 Α. Yes. 23 Lab results show that your well contains Ο. 24 concentrations of PFOA above laboratory detection limits but less than 20 nanograms 25

Page 95 1 per liter, which is the State of Vermont's 2 drinking water standard. 3 Do you see that? Α. I do. 4 5 Do you understand this to indicate to you that 6 your water levels of PFOA were less than the 7 State of Vermont's safety standard? 8 MS. JOSELSON: Objection, but you can 9 answer. 10 I understand but I don't -- it doesn't give me Α. 11 any comfort. 12 BY MR. LAFATA: 13 Do you disagree with the level the State of Q. 14 Vermont has set? 15 MS. JOSELSON: Objection. Calls for 16 expert opinion, but you can answer it if you 17 understand it. 18 Well, there's no uniform standard. Α. I mean, 19 New Jersey is what, 13, 14. I mean -- and 20 these are today's standards, and I know that 21 with more investigation -- excuse me. 22 standards could change. My 4.1 could be, oh, 23 my God. 24 So I just don't have any faith in -- all 25 I know is I have it, and I didn't ask for it,

Page 96 1 and I don't want it, any of it. 2 BY MR. LAFATA: 3 4.1 nanograms per liter, that would be even Ο. less than the New Jersey standard you 4 5 mentioned, correct? 6 Α. It would, but it's something. I want it to be 7 non detect. But I understand what you are 8 saying, but I also understand that -- it 9 doesn't comfort me, because what is it today? 10 You know, the aquifer is moving. My neighbors 11 are 70 and whatever. Is that going to come 12 over to my house? 13 Q. You used the word aquifer a few times. 14 What is an aquifer? It's the underground water level table. 15 Α. 16 And do you know anything about the aquifer Ο. 17 under your property? 18 I'm not an expert in it, but I know it's Α. 19 contaminated because it serves me and all my 20 neighbors, and my neighbors have it higher 21 than I do but some lower. 22 Do you know how deep your aquifer is on your Q. 23 property? 24 My well is 300 feet. Α. No. And may I ask how you know it's 300 feet? 25 0.

Page 97 1 Because we had a new submersible pump put in Α. 2 to replace an old jet pump, which was 180 3 feet. And the man that did it said, you know, with this new pump we can put you down 4 5 300 feet because you've got water that deep. 6 So we said sure, so... 7 How deep was the original pump? Q. 8 Α. 180. 9 And the new pump was submerged? Q. 10 Α. Yes, 300 feet. 11 Did the person who replaced your pump have to 0. 12 drill your well deeper to do that? 13 Α. A little, yes. 14 Who replaced your pump? Ο. 15 I don't recall his name. It's been a while. Α. 16 Do you remember the company he worked for? 0. 17 Well, the owner did it. I don't -- it's in my Α. 18 paperwork, but... 19 Okay. And how much did you pay to have the Q. 20 pump replaced? 21 Α. An estimate of about 5 or \$6,000. 22 Q. When did you do that? 23 '95, I think. Α. 24 Q. And what was the need -- let me rephrase that. 25

What caused you to need to replace your

Page 98 1 well pump? 2 Α. It wore -- it just wore out. 3 Was it no longer pumping appropriately? 0. Right. 4 Α. 5 Do you know how old the prior pump was? 0. 6 Α. I don't. It was there when we bought the 7 house. 8 Other than replacing the pump on your well, Q. 9 have you done any maintenance work on the well 10 or had it done? 11 No. It's worked fine. Α. 12 You said that your well has a sealed system Q. 13 earlier. 14 Do you remember that? 15 Mm-hmm. Α. 16 What did you mean by that? Ο. 17 Well, you can't just -- you know, like the old Α. 18 wells you could move the cover and look in. 19 You can't. It's -- it's something that comes 20 above the ground, and it's just -- it's all 21 You would have to unlock it and 22 whatever to get in. So it's a sealed system. 23 For your well, does the water pump into Q. 24 holding tanks on your property? 25 Α. No.

Page 99 1 It pumps directly into your house? Ο. 2 Α. Mm-hmm. 3 Is there a delay period when you use water in 0. 4 your house for the water to come? 5 Α. No. 6 Ο. When you had the pump installed for your well, 7 did you have the water quality tested? 8 Α. Yes. 9 Ο. What were the results of the test? 10 Α. Within normal limits. I don't remember 11 anything being pointed out to us that we 12 should be concerned about. 13 Do you have a copy of the well -- the water Q. 14 quality test when you replaced your pump? 15 Not that I recall. We probably did, but I Α. 16 have no idea where it could be. 17 Do you recall whether the testing included Q. 18 anything for heavy metals? 19 I don't know if that would be part of the Α. 20 routine testing or not. 21 Ο. Did you have anyone interpret the test results 22 for you? 23 Α. No. 24 Do you recall who performed the water quality Q. 25 test?

Page 100 1 I believe the State of Vermont. Α. 2 Q. Do you recall whether they wrote you anything 3 to tell you what the results were, anything 4 like that? 5 I am sure they did, but I have no idea where Α. 6 it could be. It's been a long time. 7 Is the well pump powered by your home's power Q. 8 supply? 9 Α. Yes. 10 And what is your home's power supply? Q. 11 Α. Electric. 12 You are plugged into the -- I guess the city's Q. 13 system for power; is that right? 14 We get it -- we're not off the grid. We're on Α. 15 the grid, whatever that is. 16 That's it. That's it. 0. 17 Do you use solar power, for example? 18 Α. No. 19 Okay. You've got an electric meter at your Q. 20 house? 21 Yes. Α. 22 THE VIDEOGRAPHER: Counsel, you have just 23 about five minutes, a little over five 24 minutes. 25 MR. LAFATA: Let's change the tape.

Page 101 1 MR. SILVER: Well, you've got -- it's 2 quarter of like -- it's almost quarter of 12, 3 so --MR. LAFATA: Let's at least change the 4 5 That was a pretty long break earlier. 6 I just want to keep it moving. 7 THE VIDEOGRAPHER: At 11:39 a.m. we are 8 now going off the record and closing out media 9 unit number one. We are off the record. 10 (Off-the-record colloquy.) 11 THE VIDEOGRAPHER: At 11:44 a.m. we are 12 now coming back on the record and beginning 13 media unit number two with the deposition of 14 Linda Crawford. We are on the record. 15 BY MR. LAFATA: 16 All right. Ms. Crawford, what's the highest 0. 17 level of education that you obtained? 18 I have an associate's degree in nursing. Α. 19 When did you obtain your associate's degree in Q. 20 nursing? 21 1974. Α. 22 Q. And who issued the degree? 23 Α. Castleton University. 24 Q. Casselson University? 25 Castleton. Α.

Page 102 1 Where is Castleton University? Q. 2 Α. In Castleton, Vermont. 3 After you obtained your degree in nursing, did Ο. you then get a nursing license? 4 5 Α. Yes. 6 0. What did you have to do to get a nursing 7 license? 8 Take two days of testing. Α. 9 Ο. Is that state testing? 10 Α. Yes. 11 And when did you obtain your nursing license? 0. 12 Α. Within weeks. 13 Q. Weeks of graduating? 14 Α. Yes. 15 Q. Do you have to take, during the time you have 16 a nursing license, any continuing medical 17 education to maintain the license? 18 Α. No. I think you might now, but you didn't at 19 the time I have had. 20 Was there a time when you took any of those Q. 21 classes? 22 Α. Sure. 23 Do you recall what some of the subjects may 0. 24 have been in those classes? 25 I took the legal aspects of nursing, and I --Α.

Page 103 1 we had ongoing classes at the facilities I worked at. We had ongoing education. 3 Ο. They provided onsite? They provided. I would go to seminars in Α. 5 Albany, you know, paid for by my employer and 6 things like that. 7 They were usually on -- like some of the super bugs, we had to go to learn how to -the universal precautions, those type of 10 things, you know, as things evolve and things 11 develop. 12 Keeping up to date? Q. 13 Α. Keeping up to date. 14 Do you recall taking any of those classes on Ο. 15 medications, pharmacy medications? 16 Α. Yes. 17 What are some of the things that might be Q. 18 covered in those, if you remember? 19 Α. They were just the newer -- newer drugs that 20 came out, newer antibiotics, newer 21 psychosomatic/psychotropic drugs, what side 22 effects to look for, how they worked. 23 Did you take any of these classes on Q. 24 diagnostics?

Α.

No.

25

2

4

8

9

Page 104

- Q. During your nursing work, do you recall ever diagnosing a patient with any condition?
- A. That's against the law. Nurses cannot diagnose.
- 5 Q. So I take it that's a no?
- 6 A. That's a no.
- Q. Did you take any of the medical courses in laboratory testing?
- 9 A. No.
- 10 Q. Any blood testing?
- 11 A. No.
- Q. Before obtaining your associate's degree, was that when you were in high school?
- A. No. I was out of high school for probably seven, eight years before I went to college.
- Q. Okay. What did you do during that seven or eight year period between high school and college?
- 19 A. I got married young and had a couple kids.
- Q. Where did you live at that time?
- 21 A. Pawlet, P-a-w-l-e-t, Vermont.
- Q. Where were you born?
- A. Grandville, New York.
- Q. Where did you grow up?
- 25 A. Pawlet.

Page 105 1 How old were you when you moved from Ο. 2 Grandville, New York, to Pawlet? 3 Α. Ten days. Very specific. 4 Q. 5 Α. I remember my mother telling me she had to 6 stay in the hospital ten days when she had me. 7 It was routine back then. Now ten minutes. 8 Have you ever assisted with the delivery of a Q. 9 baby? 10 In nursing school I did. Α. 11 Did you care for patients while in nursing 0. 12 school? 13 Α. Yes. 14 Did you ever care for pediatric patients in 15 nursing school? 16 Yes. Α. 17 Q. Geriatric patients? 18 Α. Yes. 19 MR. LAFATA: I think a good time to go 20 off the record for lunch. 21 THE VIDEOGRAPHER: At 11:50 a.m. we are 22 now going off the record. 23 (Lunch recess taken.) 24 THE VIDEOGRAPHER: The time now is 25 12:56 p.m. We are now coming back on the

Page 106 1 record, continuing media unit number two. 2 BY MR. LAFATA: 3 Good afternoon, Ms. Crawford. 0. Good afternoon. 4 Α. 5 Are you ready to continue with your 0. 6 deposition? 7 Are you ready to continue with the 8 deposition? She told me to breathe before I answered. 9 10 Yes, I am. 11 Did you have a nice lunch? Q. 12 Α. I did. Thank you. 13 Q. What is your current address? 14 643 West Road, Bennington, 05201. Α. 15 How long have you lived at 643 West Road? Q. 16 Α. 33 years. 17 When did you move to 643 West Road? Q. '85. 18 Α. 19 And you've lived there from 1985 to the Q. 20 present. 21 Α. Correct. 22 Q. Where did you move from? 23 Evergreen Drive in Bennington, but I don't Α. 24 remember the number. 25 Why did you move from Evergreen Drive to 643 Q.

		Page 107
1		West Road?
2	A.	Well, that was just a temporary rental, and
3		then Ted and I got married and moved to
4		bought our own house.
5	Q.	Was Evergreen Drive a rental home?
6	A.	It was a home, yes.
7	Q.	Did you say that Evergreen Drive was in
8		Bennington?
9	A.	Yes.
10	Q.	Where did you live before Evergreen Drive?
11	A.	Pawlet.
12	Q.	Is that the city?
13	A.	A city?
14		MR. SILVER: I don't think anyone has
15		ever called Pawlet a city.
16		THE WITNESS: No. That may be
17		MS. JOSELSON: Town, call it a town.
18		THE WITNESS: a thousand people. A
19		town.
20		BY MR. LAFATA:
21	Q.	Powette is the name of a town.
22	A.	Pawlet.
23	Q.	We've got a lot of testimony going on.
24		Pawlet, thank you.
25	A.	Very small town.

Page 108 1 Where is Pawlet? Q. 2 Α. Wow. 3 MS. JOSELSON: Not far. Not far. It's about 40 miles north. 4 Α. 5 BY MR. LAFATA: 6 Q. Okay. 7 MR. SILVER: Northwest. BY MR. LAFATA: 8 Was that a home, Pawlet? 9 Q. 10 Α. I went there when I was --11 MS. JOSELSON: Objection. 12 -- ten days old. I am sorry. Α. 13 MS. JOSELSON: That's okay. 14 I was born in Granville, which was just a few Α. 15 miles away from Pawlet, and I went home to 16 Pawlet and stayed in Pawlet for 30-something 17 years. I don't get around much. 18 BY MR. LAFATA:

		Page 109
11	Q.	Do you have a fireplace there?
12	A.	No.
13	Q.	A wood burning stove?
14	A.	No.
15	Q.	A septic tank?
16	A.	No.
17	Q.	Is 643 West Road a single-family home?
18	A.	Yes.
19	Q.	Do you own it?
20	A.	Yes.
21	Q.	What is the home construction, wood or stone
22		or brick?
23	A.	Wood.
24	Q.	How many bedrooms is it?
25	A.	Five.

		Page 110
1	Q.	How many bathrooms?
2	A.	Two.
3	Q.	How many floors?
4	A.	Two.
5	Q.	Is the first floor below grade or at grade?
6	A.	It's it's a split level, so it's like a
7		basement only it's finished.
8	Q.	Okay. And above that is the second level?
9	A.	Yes.
10	Q.	What is the square footage approximately, do
11		you know?
12	A.	2040, plus a garage.
13	Q.	Is the garage a covered garage?
14	A.	Yes, it's used for storage though.
15	Q.	Do you park outside the garage?
16	A.	(Nod)
17		MR. SILVER: You have to answer.
18		THE WITNESS: Hmm?
19		MR. SILVER: You didn't answer. You
20		shook your head.
21		THE WITNESS: Oh, I'm sorry.
22		MR. LAFATA:: That's all right.
23		BY MR. LAFATA:
24	Q.	So is it yes, you parked outside the garage?
25	A.	Yes.

Page 111 1 What sort of things are stored in the garage? Q. 2 Α. My husband's tools, bicycles, lawnmower, 3 recyclables. 4 That is about it? Q. 5 Α. That's about it. Do you know when the home was built? 6 0. 7 Α. I have read two different dates. One was 8 1961. One was 1965. 9 Q. Where did you read those two dates? 10 Α. On -- when we were reassessed to re-mortgage. 11 Both of those dates were on those documents? 0. 12 Α. (Nod). 13 Q. Yes? 14 Α. Yes. 15 Q. Do you own any other real property besides 16 your home? 17 No. Α. 18 Do you have any vacation property? Q. 19 No. Α. 20 How much did your home cost when you bought Q. 21 it? 22 Α. 58,5. 23 And how did you pay for the cost of your home? Ο. 24 Α. A mortgage. 25 Was it all a mortgage? Q.

Page 112 1 We paid -- we paid a down payment. Α. 2 Q. Has the mortgage been paid off? 3 It will be in July. Α. After you purchased the home, did you have any 4 Q. 5 other mortgages put on the home? 6 Α. We refinanced when the rates went down. 7 Twice. 8 You refinanced twice? 0. 9 Α. Twice. 10 Do you remember when you refinanced? Q. 11 Α. '04 and '08. 12 And why did you refinance in '04 and '08? Q. 13 Α. '04 is when the rates went quite low, so we 14 refinanced then. And '08 we needed -- I think 15 that is when we got our furnace. We needed a 16 new furnace and we needed some more home 17 improvements, so we decided to refinance. 18 Refinance to pay for the home improvements? Q. 19 Right. Α. 20 Other than buying the furnace, what other home Q. 21 improvements did you have done in your house 22 for that refinancing? 23 MS. JOSELSON: Object to the form.

Well, I think that's when we put all the new

can answer it if you understand it.

Α.

24

25

		Page 113
1		replacement windows in.
2		BY MR. LAFATA:
3	Q.	Anything else?
4	A.	No. Between the two they were quite
5		expensive.
6	Q.	Were all of the windows replaced with new
7		windows?
8	A.	Mm-hmm. Yes. Yes.
9	Q.	Was it the frame as well as the glass?
10	A.	Yes.
11	Q.	What sort of furnace did you have installed in
12		'08?
13	A.	Oil.
14	Q.	What was there before?
15	A.	Oil.
16	Q.	Why did you replace the furnace?
17	A.	Age.
18	Q.	Why did you replace the windows?
19	A.	Age.
20	Q.	How much land is how much land does your
21		home sit on?
22	A.	1.4 acres.
23	Q.	So you have a front lawn?
24	A.	Yes.
25	Q.	A back yard?

		Page 114
1	A.	Yes.
2	Q.	Is the front yard grass?
3	A.	Yes.
4	Q.	Are there any wooded areas in your land?
5	A.	Just some sumac in the back but it gives us
6		privacy, so we leave it.
7	Q.	Do you have any fences around your land?
8	A.	No.
9	Q.	About how many sumac is in the back, are in
10		the back?
11	A.	Well, not as many as there was before this
12		last storm, but I would say ten.
13	Q.	Any other trees around your property?
14	A.	We have several maples.
15	Q.	How many maples?
16	A.	Four.
17	Q.	Any other trees on your land?
18	A.	A willow.
19	Q.	How many of those?
20	A.	One.
21	Q.	Any other trees?
22	A.	I don't think so.
23	Q.	You said in the back the sumac provides some
24		privacy.
25		What's beyond the sumac?

Page 115 1 A big lawn and a house. Α. 2 Who lives at that house? 0. 3 They just moved in. We met them, but their Α. 4 first names are Sol and Michelle. That's all 5 I know. 6 Q. Do you have neighbors on the other side of 7 your property? 8 Α. Yes. 9 Q. Where are they? 10 Α. Right and left. 11 Who are the neighbors on the left? Q. 12 Α. Donna. 13 Q. Who are the neighbors on the right? 14 Lauren, L-a-u. Α. 15 Are those the individuals who live in each Q. 16 house? 17 Yes. Α. 18 Q. Do you know whether Donna, Lauren, or -- is it 19 Solomon behind your house? 20 Sol. Α. 21 Ο. Sol. 22 Α. I don't know what his name is. 23 Do you know whether any of them had their Q. 24 water tested for PFOA? 25 Α. Oh, yes.

Page 116 1 Do you know what the results were for those Ο. 2 tests? 3 I know they were elevated, but I don't recall Α. 4 the numbers. 5 Do you know if any of them had their soil Q. tested for PFOA? 6 7 I don't know that. Α. 8 Ο. Has your soil been tested for PFOA? 9 Α. No. 10 Where on your property is your well? Q. 11 Right off the back deck. Α. 12 Do you receive municipal water in addition to Q. 13 your well water, or do you just use well 14 water? 15 Α. We haven't been hooked up yet. 16 Do you intend to get hooked up? 0. 17 Α. Yes. 18 Q. We talked about the new pump you had put in 19 your well earlier. 20 Are there any other maintenance you have 21 done on the well? 22 Α. No. 23 Before 2016, did you ever consider trying to Ο. 24 get hooked up to the municipal water? 25 Α. No.

Page 117 1 Why is that? Q. 2 Α. Because my well water tastes good; it's free 3 of chemicals; it works, why fix it; never run out of water; and we don't have to pay that 4 5 quarterly fee for town water. 6 Ο. What is the quarterly fee for town water? 7 I'm not sure, but I think it's like 150 to 200 Α. 8 a quarter. It keeps going up. 9 Other than your house, are there any other Q. 10 structures on your land? 11 Α. No. 12 Is there any wood shed or tool shed? Q. 13 Α. No. 14 Is the garage connected to your house? 0. 15 Α. Yes. Well, there is no inside -- there is no 16 egress into the house itself, but it is 17 attached. The side is attached? 18 Q. 19 Yeah. Α. 20 MS. JOSELSON: Slow down for Beth. 21 BY MR. LAFATA: 22 Do you garden on your property? Q. 23 We didn't last year because we were concerned Α. 24 with PFOA in the soil. 25 What about before that? 0.

Page 118 1 Yes, we did. Α. 2 Q. What did you garden? 3 Tomatoes, asparagus, potatoes, carrots. Α. Anything else? 4 Q. 5 Α. It wasn't -- anything my husband had the urge 6 to try. 7 And did you eat the fruit and vegetables in Q. 8 your garden? 9 Α. Yes. 10 Do you have any flower gardens? Q. 11 Α. Yes. 12 How many flower gardens do you have? Q. 13 Α. Three. 14 Where are they located? Ο. 15 One is in the front lawn quite close to the Α. 16 road; the other is in the front of our house 17 next to the house; and the other one is around where the well was built. 18 19 Do you ever raise any animals for consumption Q. 20 on your land? 21 Α. No. 22 Q. Do you have any animals on your land? 23 Two cats. Α. 24 Are they inside cats or outdoor? Q. 25 Inside. Α.

Page 119 1 How would you characterize the soil in your Q. 2 land? 3 MS. JOSELSON: Object to the form. You can answer it if you understand it. 4 5 I really don't know. Α. BY MR. LAFATA: 6 7 Q. Is there clay in your land, in your soil? Α. 8 I don't know. I know the grass grows well. Is there sand in your soil? 9 Q. 10 Α. I don't know. 11 Is your soil rocky? Q. 12 Α. No. 13 Q. What type of foundation does your house sit 14 on? 15 Α. Cement. 16 How deep does the cement foundation go? 0. 17 Α. I don't know. 18 Do you have a driveway to your garage? Q. 19 Yes. Α. 20 Is it a paved driveway? Q. 21 Α. No. 22 Q. What is the nature of the driveway? 23 Gravel. Α. 24 Do you have a basement? Q.

It's a split level, and the basement is

Α.

No.

25

Page 120 1 furnished, and we have bedrooms down there. 2 Got it. Q. 3 Are there any power or sewer lines buried 4 in your property? 5 Α. Sewer. 6 0. Are there any power lines buried on your 7 property? 8 Not to my knowledge. Α. 9 Q. Is the power connection above ground? 10 Α. Yes. 11 Okay. When was the last time you replaced the 0. 12 roof on your property? 13 Α. I believe it was in the '90s. 14 What was the roof before you replaced it? 0. 15 Α. Shingled. 16 What did you replace it with? 0. 17 Α. Shingle. 18 Q. Why did you replace the roof? 19 Α. Age. 20 Was it leaking when you replaced it? Q. 21 Α. No. 22 Q. Was it damaged when you replaced it? 23 Some shingles were missing. Α. 24 Q. Do you have siding on your house? 25 Wood. Α.

Page 121 1 Have you ever replaced the siding? Q. 2 Α. No. 3 Is your house, the exterior, painted? 0. Yes. 4 Α. 5 When was the last time it was painted? 0. 6 Α. My husband has kind of done it in increments, 7 so I know he did some two or three years ago. 8 You know, like he does what's needed. So it's 9 ongoing basically. 10 Do you know how much you've cost -- or how Q. 11 much you've -- let me rephrase that -- how 12 much you've spent to paint the house? 13 Α. Just the cost of the paint because he does the 14 work himself. 15 Do you store the extra paint in your garage? Q. 16 Α. Yes. 17 Q. How much did you pay to replace the roof? Α. 18 I would have to give you an estimate. 19 What is your estimate? Q. 20 About 3,000. Α. 21 Ο. Okay. Do you ever make any upgrades to the 22 landscaping? 23 Α. Yes. 24 Q. What have you had done? Well, my husband does everything himself. 25 Α.

Page 122 1 when we moved there, trees had fallen and then 2 left, and grass had actually grown over it, so 3 my husband dug all that up, and he put in -planted grass. He cleaned up a lot of the, 4 5 you know, wild weeds that had grown up and 6 made a little more lawn. He put in the flower 7 gardens. 8 So was most of that when you first moved into Q. 9 the house? 10 Yes. Α. 11 Since then, have there been any major changes Ο. 12 to the landscaping? 13 Α. No. 14 Regular maintenance? 0. 15 Α. (Nod). 16 Is there a pool on your property? Ο. 17 Α. Yes. 18 Where is the pool? Q. 19 Off the back deck. It actually has its own Α. 20 deck. We have two decks. 21 Ο. And how deep is the pool? 22 Α. Four, four and a half feet. It's aboveground. 23 0. Where is the pool equipment? 24 Α. In the garage. 25 And do you maintain the pool yourself or you

Q.

Page 123 1 hire someone? 2 Α. My husband does. 3 He takes care of the pool chemistry? 0. Yes. 4 Α. 5 Do you use your pool? 0. 6 Α. Yes. 7 Is there a spa or Jacuzzi on your property? Q. 8 Α. No. 9 Do you recall how much you spent on your new Q. 10 windows? 11 Once again, it would be an estimate. Α. 12 my brother and my husband put them in because 13 my brother is a contractor. So all we did was 14 buy the windows, but they were still a couple 15 thousand maybe. I don't know. They were 16 thousands. 17 Q. Do you remember the brand of the windows? 18 Α. I don't. 19 Have you ever done any remodeling inside the 20 house? 21 Α. Yes. 22 What did you have remodeled? Q. 23 Bookshelves, both bathrooms, one of the Α. 24 bedrooms downstairs closets were built, 25 bookshelves were built, and paper and

Page 124 1 painting. 2 Q. Was there ever a time when there was 3 remodelling work done in the kitchen? New countertops. 4 Α. 5 When were the countertops changed? 0. I think the late '80s. 6 Α. 7 What are the countertops in the kitchen? Q. 8 they stone or are they vinyl -- what --9 Α. Formica maybe. 10 You ever changed the flooring in your house? Q. 11 Α. We put new carpet downstairs. 12 Where else is there carpet in your house? Q. 13 Α. Nowhere. Just the bedrooms downstairs. 14 The bedrooms downstairs? 0. 15 Α. (Nod). 16 What is the flooring in the rest of the house? 0. 17 Α. Hardwood. 18 Have you ever refinished your hardwood floors? Q. 19 No. Α. 20 Q. Do you shampoo your carpet? 21 Α. No. 22 Q. Have you made any changes to the plumbing 23 system in your house? 24 Just to install a new dishwasher. Α. I think 25 they had to change some pipes.

Page 125 1 When did you install a new dishwasher? Q. 2 Α. Within the last year. 3 What kind of dishwasher did you buy last year? 0. Frigidaire. 4 Α. 5 Any other major appliances -- we talked about 0. 6 the furnace and the dishwasher -- that you had 7 changed? 8 We have been there over 30 years, so we've had Α. 9 a new refrigerator, a new stove -- cook --10 wood -- cook stove. That's all I recall. 11 MR. LAFATA: Mark this please. 12 (Deposition Exhibit No. 12 was marked for 13 identification.) 14 BY MR. LAFATA: 15 Ms. Crawford, do you see Exhibit 11 in front Q. 16 of you? 17 No. Α. I think it's 12. 18 MS. JOSELSON: 19 MR. LAFATA: Oh, thank you. 20 BY MR. LAFATA: 21 12? Ο. 22 Α. Yes. Would you mind keeping the clip on it just so 23 0. 24 we don't lose --25 Α. Oh, I am sorry.

Page 126 1 -- the order? That's all right. Q. 2 Α. I thought you were going to --3 Do you recognize the picture here? Ο. Α. Yes. 4 5 Whose home is this? Ο. 6 Α. Mine. 7 Q. And did you take these pictures? 8 Α. No. 9 Q. Who took them? 10 Α. My husband. 11 Okay. What is shown in this first picture? Q. 12 A portion of my kitchen. Α. 13 Q. Do you know when these pictures were taken? 14 Within the last three months. Α. 15 Q. Oh, so your kitchen looks this way today? 16 Α. Yes. 17 Q. You mentioned that you had a new stovetop put 18 in. Is this the new stovetop here? 19 The whole stove. Α. 20 It's electric? Q. 21 Α. Yes. 22 Q. Did you ever have the cabinetry in your 23 kitchen changed while you lived there? 24 Α. No. Did you ever have the kitchen repainted? 25 Q.

Page 127 1 Α. Yes. 2 Q. How many times has it been repainted? 3 Α. Once. Was the tile and the back splash there when 4 Q. 5 you moved in? 6 Α. Yes. 7 And these are the new countertops you Q. 8 mentioned, right? 9 Α. Yes. 10 Would you turn to the next page, please? Turn Q. 11 to the next page, please? 12 Is this also your kitchen? 13 Α. Yes. 14 Was there ever a time you changed the kitchen sink? 15 16 No. No. Α. 17 This is the original kitchen sink? Q. 18 Mm-hmm. Α. 19 Okay. This is the new dishwasher here? Q. 20 Α. Mm-hmm. Yes. 21 What is the flooring in the kitchen? Q. 22 Α. Linoleum. 23 Did you ever change the flooring in your Q. 24 kitchen? 25 Α. No.

		Page 128
1	Q.	This is the original flooring?
2	A.	(Nod).
3	Q.	Would you please turn to the next page?
4		This is the same kitchen, right?
5	A.	Yes.
6	Q.	Would you turn to the next page, please?
7		Sorry.
8		Same kitchen?
9	A.	Yes.
10	Q.	What is the door there on the left, the narrow
11		one?
12	A.	A little pantry.
13	Q.	Was that there when you moved in?
14	A.	Yes.
15	Q.	Was the wallpaper original or was that added?
16	A.	Added.
17	Q.	In the kitchen?
18	A.	Yes.
19	Q.	When did you add the wallpaper?
20	A.	Probably five years after we moved in, so
21		1990.
22	Q.	I also see some wallpaper in the hallway
23		there.
24		Was that there when you moved in?
25	A.	No.

Page 129 1 When did you add that wallpaper? Q. 2 Α. Early '90s. Would you please turn to the next page? 3 Ο. 4 What does this picture show? 5 My bedroom. Α. 6 Ο. Is this on the upper level of your house? 7 Α. Yes. 8 This is the hardwood flooring in your house? 0. 9 Α. Yes. 10 When you mentioned you had bookshelves Q. 11 installed, are these the bookshelves you were 12 referring to? 13 Α. No. Obviously we need more. 14 Is this window in your bedroom one of the new 0. 15 windows you had installed? 16 Α. Yes. 17 Q. Did you also have new window treatments installed? 18 19 Α. Yes. 20 Would you please turn to the next page? 0. 21 What room is this? 22 Α. The office. It's one of the bedrooms. We use 23 it for an office. 24 Is this on the same floor as the master Q. 25 bedroom?

Page 130 1 Α. Yes. 2 Q. Was the wallpaper in the office original or 3 was that new? 4 New. Α. 5 What about for your bedroom? 0. 6 Α. New. 7 Do you use your office for work? Q. 8 Α. No. Who uses it? 9 Q. 10 Α. We just use it, computer. 11 If you turn the page, please? Q. 12 What bedroom is this? 13 Α. This is an extra bedroom that we just use for 14 It's upstairs. quests. 15 Q. And is the flooring here original? 16 Α. The flooring? 17 Mm-hmm. Q. 18 Α. Yes. 19 Is the wall painted? Q. 20 Α. Yes. 21 Has it ever been repainted? Ο. 22 Α. Yes. 23 How many times has it been repainted? Q. 24 Α. Twice. 25 Q. When was the most recent time?

Page 131 1 Probably '95, '96. Α. 2 Q. All right. Would you turn the page, please? 3 Where in your house is this photograph 4 taken? 5 This was in that same extra bedroom. Α. 6 0. Are these the built-in bookshelves you 7 referred to earlier? 8 Α. Yes. 9 Ο. So these are built into the wall? 10 Α. Mm-hmm. Yes. 11 If you turn the page, please? 0. 12 Is this the same bedroom? 13 Α. Yes. 14 Is that on the left the closet to the bedroom? 15 Α. Yes. 16 If you turn the page, please? 0. 17 Where is this in your house? It's downstairs. 18 Α. 19 What is the purpose of this room? Q. 20 That's the family room for my daughter and her Α. 21 friends. 22 Looks like a game here on the left? Q. 23 Yes. Α. 24 What is the flooring in the downstairs area Q. 25 here?

Page 132 1 Α. Carpet. 2 Q. And is there wallpaper on the left wall? 3 Yes. Α. And the is right wall wallpaper or painted? 4 5 Α. That's wallpaper also. Just it doesn't show 6 well. 7 How recently was the wallpaper in this room Q. installed? 8 9 Α. Late '90s. 10 Would you turn the page, please? 11 Is this the same room? 12 Yes, it is. Α. 13 Q. I see that game table on the far right side? 14 Α. Yes. 15 Q. Is there an appliance on the right-hand 16 side behind the chair? 17 Dehumidifier. Α. 18 Q. Does that service the downstairs area or the 19 whole house? 20 Just that room. Α. 21 Is the appliance on the bottom left just an 22 area heater, by the globe? 23 No, that's the dehumidifier. Α. 24 Q. Oh, excuse me. 25 On the right-hand side behind the chair,

Page 133 1 what is that large white thing against the 2 wall? 3 A freezer. Α. Okay. Is the bookshelf here built into the 4 Q. 5 wall? 6 Α. Yes. 7 If you turn the page, please? One more time. Q. Is this the same room we were just 8 9 looking at? 10 Α. Yes. 11 Okay. Turn the page, please? 0. 12 Where is this room in your house? 13 Α. It's the downstairs bedroom. 14 And when was the wallpaper here installed? 0. 15 Early '90s. Α. 16 Is it carpeted? 0. 17 Α. Yes. 18 When was that carpeting installed? Q. 19 The same time as the paper also. In the '90s. Α. 20 Would you turn the page, please? 0. 21 Is this the same bedroom? 22 Α. Yes. 23 What is the appliance on the floor there on Q. 24 the left? 25 It's another dehumidifier.

Page 134 1 Do you have air conditioning in your house? Q. 2 Α. No. If you turn the page, please? 3 0. 4 Is this a bathroom? 5 Α. Yes. Where is this bathroom? 6 0. 7 Α. Downstairs. 8 Q. What is the flooring in the downstairs 9 bathroom? 10 Α. Carpet. 11 When was this carpet installed? 0. 12 Α. It was all put in at the same time. About 13 five or six years ago. 14 And are the walls here painted? 0. 15 Α. Yes. 16 Have you ever made any changes to the 0. 17 appliances in this bathroom, the toilet, the 18 sink, the shower? 19 The shower and the sink. Α. 20 What was done to the sink? Q. 21 Α. Totally replaced. 22 Q. When did you do that? 23 Oh, boy. I don't recall. Α. 24 What was done to the shower? Q. 25 Hmm? Α.

Page 135 1 What was done to the shower? Q. 2 Α. Replaced. 3 0. When did you replace the shower? The same time we did the sink. I don't recall 4 Α. 5 exactly. Is this an outside facing window on the wall? 6 Ο. 7 Α. Yes. 8 So this is a new window? 0. 9 Α. Yes. 10 If you turn the page, please? 11 Is this the same bathroom? 12 Yes. Α. 13 Q. Is that the sink you were referring to 14 earlier? 15 Α. Yes. 16 Do you recall when this wall was painted in 0. 17 this bathroom? 18 I don't recall exactly. Α. 19 Was it within the last ten years? Q. 20 Α. I believe so. 21 Would you turn the page, please? 22 Where is this in your house? 23 That is where our furnace is, washer and Α. 24 dryer, water softener. 25 So on the left-hand side there is a rounded Q.

Page 136 1 object. What is that? 2 That's a wood furnace that we don't use. Α. When was last time you used it? 3 Ο. It's been over 20 years. 4 Α. 5 MS. JOSELSON: This? 6 THE WITNESS: Mm-hmm. 7 BY MR. LAFATA: 8 On the -- in the center of the photo, there is Ο. 9 a large appliance. Is that a washing machine? 10 Α. Yes. 11 How old is the washing machine? 0. 12 Α. About five years. 13 Q. And what's the appliance to the left of that, 14 the large white one? 15 The water softener. Α. 16 Q. How old is that? 17 Α. I don't recall. 18 On the far right-hand side, there is a bucket. Q. 19 It's on the ground. 20 Do you know what those are? 21 Α. I think my husband used those like to water 22 the garden. Things like that. 23 What do you mean by watering the garden with Q. 24 the buckets? 25 Α. Well, there is a water tank in here, and he

Page 137 1 would fill up the buckets and go up the 2 hatchway, and if we hadn't had rain, he would 3 water the garden. I see. Rather than a hose? 4 Q. 5 Α. Yes. 6 Okay. Where would he fill up the water to Ο. 7 water the garden? On the next page, there is a -- do you see 8 Α. 9 blue on the left hand --10 Q. A pipe? 11 There is a pipe, and then there is a blue Α. 12 water tank. 13 Q. Yes. 14 He would take the water from that. Α. 15 Q. Okay. It's just a small tank, that makes it so when 16 Α. 17 you turn on the water faucet you don't have to wait. 18 19 So this blue tank is -- stores water? Q. 20 Yeah. Α. 21 Okay. On the top of the page that you turned 22 to, there is some ductwork. 23 Do you see that at the top? 24 Α. Mm-hmm. 25 Ο. Is that for your heater?

Page 138 1 I don't really know. Α. 2 Q. Okay. There is an appliance in the middle of 3 the picture. Is that a dryer? Yes. 4 Α. 5 How old is the dryer? Ο. Α. 6 Probably 15 years. 7 And the floor in this part of the basement is Q. 8 concrete? 9 Α. Yes. 10 There is a panel on the wall above the dryer. Q. 11 Do you see that? 12 Α. Yes. 13 Q. Do you know what panel that is? 14 That's the fuse box -- or the electrical box Α. 15 with the -- what do you call -- not fuses but 16 the other thing. 17 Q. Okay. Above the dryer there is a silver pipe 18 that goes into the wall. Do you see that? 19 Yes. Α. 20 Does that go outside? Q. 21 Α. Yes. 22 Q. Do you see there is a fan to the left of the 23 dryer, an upright fan? 24 Α. Yes. 25 Q. And to the left of that, is it a trash can?

Page 139 1 Α. Yes. 2 Q. Do you know what the bucket is below that? 3 Α. Just an empty bucket. Okay. Would you please turn to the next page? 4 Q. 5 Where in your house is this picture? 6 Α. Little dining nook. 7 Is this where you eat? Q. 8 Α. Yes. 9 Q. And the back door there, does that go to the 10 backyard? 11 Α. Yes. 12 There's a porch out there? Q. 13 Α. A deck. 14 What is the deck made out of? 0. 15 Α. Wood. 16 When was the last time the deck had been Ο. 17 replaced? It's the original deck we built like 33 years 18 Α. 19 ago. 20 Is there a need to sand it or oil it or Q. 21 anything like that, maintain it? 22 Α. No. 23 Is this flooring, the wood flooring, original 0. 24 here? 25 Α. Yes.

Page 140 1 There is a light fixture on the ceiling, Q. 2 right? 3 Yes. Α. Was that also original? 4 5 Α. Yes. Are the doors to the back deck original? 6 0. 7 Α. No. 8 When were those put in? Ο. 9 Α. 1985. 10 Would you please turn the page? 11 Is this the master bedroom again? 12 Α. Yes. 13 Q. Would you please turn the page again? 14 Is this the second bathroom? 15 Α. Yes. 16 Where in your house is this bathroom located? 0. 17 Right outside there is a door to our bedroom Α. 18 and a door to the hallway. 19 This bathroom has two doors? Q. 20 Α. Yes. 21 Okay. And have you done any remodeling work 22 to this bathroom here? 23 Well, he took it to the studs, took everything Α. 24 off and redid the whole thing. 25 Is this Ted, your husband? Q.

Page 141 1 Mm-hmm. Α. 2 Q. Did he replace the sink here with -- did he 3 replace the sink? 4 Α. Yes. 5 Did he replace the flooring? 0. 6 Α. Yes. 7 What is the current flooring there? Q. 8 Α. Linoleum. 9 Did he replace the shower? Q. 10 Α. Yes. 11 Did he replace the toilet? 0. 12 Α. Yes. 13 Q. Do you remember when he did this work? 14 Α. I don't recall. He is always doing something. 15 Q. Would you please turn to the next page? 16 Is this another picture of your dining 17 area? Mm-hmm. 18 Α. 19 Okay. If you turn to the next page, please? Q. 20 Is this your kitchen? 21 Α. Yes. 22 Q. All right. The next page, please? 23 Where in your house is this picture? 24 Α. Upstairs. 25 And what room is this? Ο.

Page 142 1 Α. Living room. 2 Q. Would you turn the page, please? 3 Is this the hallway in your house? 4 Yes. Α. 5 This was the wallpaper we talked about earlier 0. 6 through the kitchen, right? 7 Mm-hmm. Α. 8 What is the door at the end of the hallway? 0. 9 Α. Closet. 10 Is the wood framing around the doors in your Q. 11 house, are those original too? 12 Α. Yes. 13 Q. If you turn the page, please? 14 Is this the upstairs sitting area? 15 Α. Yes. 16 Were these bookshelves added to the house 0. 17 behind the couch? 18 Α. Yes. 19 Do you know what the left of the bookshelf 20 behind the couch, what that pipe is from the 21 floor to the ceiling? 22 Α. Oh, that was my mother's pole lamp, and when 23 she died -- it's from like the 1950s. 24 So it detaches? Q. 25 Α. Yeah.

		Page 143
1	Q.	If you turn the page, please?
2		What room is this?
3	A.	This is the downstairs bedroom.
4	Q.	This is carpeted?
5	A.	Yes.
6	Q.	Is the wallpaper original or was that added?
7	A.	Added.
8	Q.	This is the last picture in this set, right?
9	A.	Yes.
10		(Deposition Exhibit No. 13 was marked for
11		identification.)
12	Q.	Mrs. Crawford, do you have a copy of
13		Exhibit 13 in front of you?
14	A.	Yes.
15	Q.	And do you see at the top, in the middle and
16		toward the top, it says, Declaration of Linda
17		Crawford in Support of Plaintiffs' Motion for
18		Class Classification?
19	A.	Yes.
20	Q.	Would you turn with me to the last page?
21		And whose signature is on this page?
22	A.	That's mine.
23	Q.	Okay. Do you remember reading this when you
24		signed it?
25	A.	Yes.

Page 144 1 Would you turn with me to the first page? 2 Do you see the first paragraph there, 3 number one? Yes. 4 Α. 5 And the second sentence, do you see: 0. 6 personal knowledge of the statements contained 7 in this declaration, and if called to testify, 8 I could and would testify competently to them. 9 Do you see that? 10 Yes. Α. 11 That is true, right? Ο. 12 Α. Right. 13 Q. Would you turn with me to the second page? 14 In paragraph eight, do you see that 15 number? 16 Yes. Α. 17 It starts out: We have a low level of PFOA in Q. 18 our well as of last test. We have a big 19 investment in our well. 20 Do you see that? 21 Α. Yes. 22 Q. And when you refer to a big investment, what 23 are you referring to in your well? 24 A. The thousands of dollar we paid to get a new 25 pump, submersible pump, and have it drilled

Page 145 1 further down. 2 Q. How much was paid to drill, aside from the 3 pump, to drill? I don't know what was what. It was just one 4 Α. 5 bill. Do you know what the total bill was? 6 Ο. 7 Α. I don't. Thousands of dollars. 8 Do you have a copy of the bill? 0. I do. 9 Α. 10 Would you be willing to provide a copy of the Q. 11 bill? 12 Α. Yes. 13 Q. Okay. 14 My hus -- can I just say that my husband is Α. 15 coming in next week. Can he bring it then? 16 0. Sure. 17 Α. Okay. 18 Q. Thank you for that. 19 In the next sentence, do you see it says: 20 We had the option to connect to municipal 21 water in the past as a waterline is in place in front of our house? Do you see that? 22 23 Yes. Α. 24 Q. What did you mean when you wrote the waterline 25 is in place in front of your house?

A. A few years ago they extended the waterline, and when it first went by our house we couldn't hook on because they had gotten a grant for I believe a farm that was up the road or not -- it's not an operating farm.

It's a -- they hold receptions and whatever.

And then we could get on it, but we didn't want to because our water is fresh and pure and clean and no chemicals, so -- and we didn't want to pay the quarterly bill, so --

- Q. So there is a hookup, at least for your house, that is available, right?
- A. Yeah, there's a hydrant right in my front yard.
- Q. A fire hydrant?
 - A. (Nod.

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Q. In paragraph 9 you write: As a result of the contamination of the groundwater beneath my property, as well as my property and soils, with PFOA, I have suffered damages, including, but not limited to, real property damage.

Do you see that?

- A. Yes.
 - Q. Diminution of property value. Do you see that?

Page 147 1 Α. Yes. 2 Q. Loss of use and enjoyment of property, 3 annoyance, upset, aggravation, and inconvenience. 4 5 Do you see that? 6 Α. Yes. 7 Q. When you refer here to real property damage, 8 what do you mean? 9 Α. I mean that my house is not worth what it was. 10 Do you mean anything else? Q. 11 Well, they are going to have to dig up my Α. 12 front yard to put the water in. 13 Q. Anything else? 14 A lot of activity in our neighborhood, trucks Α. 15 and whatever putting water lines in, but 16 that -- yes. That hasn't damaged my house but 17 it's aggravating. 18 And do you mean anything else by real property Q. 19 damage? 20 Not that I know, except that my soil is Α. 21 contaminated. 22 Does that cover it all for real property Q. 23 damage? 24 Α. The -- if they bury my well, they're going to 25 have to dig up that. That's going be a mess

Page 148 1 right in my -- right off my deck. 2 Q. Did someone tell you that someone -- would 3 need to bury your well? Yes. 4 Α. 5 And who said that? 0. I think one of the men from the State of 6 Α. 7 Vermont, one of the departments, that --8 because we asked, can we keep our well open so 9 that we could use that for drinking water. 10 And they said, no, that has to be totally 11 filled in, the pump taken out and then totally 12 filled in. 13 Is there any other real property damage that Q. you refer to here that you haven't told me? 14 15 Α. Not that I can recall right now. 16 Diminution of property value. We talked about 0. 17 that, right? 18 Α. Mm-hmm. 19 What has been the diminution of property value Q. 20 for your house? 21 Well -- you mean money, numbers? Α. 22 Q. Sure. 23 Well, we always thought we would probably sell 24 it for, you know, 185 to 200, and now it's 25 probably 140 to 155.

Q. And the next section says loss of use and enjoyment of property.

Do you see that?

A. Mm-hmm.

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- Q. What do you mean by that?
- A. We don't feel free to grow our own vegetables anymore because we don't know about the soil, and it's just -- just awful knowing that, you know, underneath your house, your property, there is poison. Sometimes I sit on the deck and I -- I just don't feel safe. I just -- it's not the same.
- Q. Other than the vegetable garden, are there other things that you used to do on your property that you are no longer able to do?
- A. We don't fill our pool with our well water.
- Q. What do you fill it with?
- A. We have to pay the town 100 -- I believe \$150 to use the hydrant.
- 20 Q. Anything else?
- 21 A. Not that I can think of right now.
- Q. You mention here annoyance, upset,aggravation, and inconvenience.
- What do you mean by that?
- 25 A. I mean, I got really angry when I learned that

my well was polluted, and it's upsetting that you have to change your way of living actually because of this poison that I didn't ask for and I don't want.

And annoyance and aggravation, that was all the work that's going on in my neighborhood to put these new waterlines in.

I opened my windows yesterday because it was nice, and my house was just full of dust.

There's dust everywhere from all the trucks.

A lot of truck traffic, people coming to your door because they want to check out where they are going to put the lines. It's kind of aggravating.

- Q. Would you turn the page, please?

 In paragraph 11, do you see that?
- A. Yes.

Q. It says: I have no known conflicts with other members of the proposed class.

What do you mean by that?

A. I have -- you know, I am not -- I don't have a bad relationship with anybody. I am not angry at anybody. I just want to help everybody, and that includes all these members of the class.

Page 151 1 In paragraph 15, do you see that below? Ο. 2 Α. Yes. 3 You say I am not pursuing individual or 0. 4 class-wide claims against the defendant for 5 psychiatric or psychological injury. 6 Do you see that? 7 Yes. Α. 8 0. Is that true? To the best of my knowledge, yes. 9 Α. 10 Okay. Q. MR. LAFATA: Good time for a break? 11 12 MS. JOSELSON: I was going to say it's 13 been about an hour. 14 THE VIDEOGRAPHER: At 1:50 p.m. we're 15 going off the record and we are concluding 16 media unit number two of our deposition. 17 are off the record. 18 (Brief recess taken.) 19 (Deposition Exhibit No. 14 was marked for 20 identification.) 21 THE VIDEOGRAPHER: At 2:06 p.m. we are 22 coming back on the record. Now beginning 23 media unit number three of our deposition with 24 Linda Crawford. We are on the record. 25 BY MR. LAFATA:

Page 152 1 Ms. Crawford, do you recall whether your home Q. 2 has ever been appraised? 3 Yes, it has. Α. How many times has the value of your house 4 Q. 5 been appraised? 6 Α. Four. 7 When was the first time it was appraised? Q. '85. 8 Α. 9 Was that in connection with the original Q. 10 purchase? 11 They just happened to -- we were in the Α. 12 zone to be reappraised at that point. 13 Q. Was this something the state did? 14 No, the town. They don't do the whole town Α. 15 all at once. I believe they do it in 16 sections, different times. 17 And after the appraisal in 1985, what was the Q. 18 next time it was appraised, if you remember? 19 Α. 199. 20 Who performed that appraisal? Q. 21 Α. The town. 22 Q. And after that?

And when was the most recent time it was

Α.

Q.

'04.

appraised?

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- A. Well, I think I made an error. In '08, we refinanced again, and they just accepted the '04 assessment. So it was actually done three times. But I believe we have four documents, but they took the '04 appraisal for the '08 appraisal.
- Q. Understood. So then the most recent time
 someone had appraised your house was 2004; is
 that correct?
- 10 A. Yes.

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- 11 Q. Who performed the 2004 appraisal?
- 12 A. I don't know. They were different people. I
 13 don't recall exactly who it was.
- Q. In the 1985 appraisal, do you know what the appraised value was?
- 16 A. 61,5.
- Q. And in the 1999 appraisal, do you know what the appraised value was?
- 19 A. 99.
- Q. What about in the 2004 appraisal?
- 21 A. 148.
- Q. And I am understanding 99 and 148 to be thousands, right?
- 24 A. Yes.
- Q. Okay. I am handing you a copy of exhibit 14.

		Page 154
1		At the top do you see it says Uniform
2		Residential Appraisal Report?
3	A.	Mm-hmm. Yes.
4	Q.	Would you turn to the next page?
5		Do you see there is, on the bottom, a
6		date of November 3, 1992? Do you see that?
7	A.	Yes.
8	Q.	And it was signed by David Buckley.
9		Do you see that?
10	A.	Yes.
11	Q.	Do you remember David Buckley?
12	A.	I remember he was one of the ones that did an
13		appraisal. I didn't know which one.
14	Q.	For this 1992 appraisal, do you see it's
15		\$99,000?
16	Α.	Mm-hmm. Yes.
17	Q.	Do you have any reason to disagree with the
18		appraisal in 1992?
19	Α.	No.
20		(Deposition Exhibit No. 15 was marked for
21		identification.)
22	Q.	Ms. Crawford, do you see Exhibit 15 in front
23		of you?
24	Α.	Yes.
25	Q.	And do you see on the first page there's a

Page 155 1 date of February 5, 2004? On the cover page. 2 Α. Yes. And it says this is for the Bank of 3 Ο. Bennington. 4 5 Do you see that? Α. 6 Yes. 7 Was this in connection with any financial Q. 8 transaction with your house? 9 Α. The re -- re-mortgaging. 10 Okay. And this was by Richard Goodfellow. Q. 11 Do you see that? 12 Α. Yes. Do you remember Richard Goodfellow? 13 Q. 14 I don't remember him. I remember the name. Α. 15 Q. Would you turn to -- on the bottom right it 16 says 23? 17 Α. Yes. 18 At the top do you see it says Uniform Q. 19 Residential Appraisal Report? 20 Yes. Α. 21 On the bottom there, do you see there is a Ο. 22 typed line that says -- do you see since the 23 subject was built? Do you see that? 24 Α. Yes. Since the subject was built prior to 1978, 25 Q.

Page 156 1 there may be lead paint present. This is 2 typical and has not affected single family 3 home values. 4 Do you see that? 5 Α. Yes. 6 0. Have you ever had any paint test in your house 7 for lead? 8 Α. No. 9 Q. Would you turn to the next page, please? 10 Do you see at this bottom there is 11 an appraisal date of February 5, 2004? 12 Yes. Α. 13 Q. Okay. And then beneath that, do you see the 14 appraisal value of \$148,000? Do you see that? 15 Α. Yes. 16 Do you have any reason to disagree with the 0. 17 appraisal from 2004 of 148,000? 18 Α. No. 19 Would you turn please to page 26 of this 20 document? 21 Do you see a diagram on the top? 22 Α. Yes. Have you -- look over this diagram. Does this 23 0. 24 appear to you to be an accurate diagram of 25 your house, the layout?

- 1 A. It doesn't have the second deck on it.
- Q. Where is the second deck to your house?
- A. The pool is here and the deck -- there is
- steps going down this deck to the pool, the deck by the pool. It's right in here.
- Q. Let me try to clarify it for the record.
- You are pointing to the left of where the document says deck; is that right?
- 9 A. Yes.
- Q. That is a location of where your pool is,
- 11 about?
- 12 A. Yes.
- Q. And you said there's an additional deck around the pool or near the pool?
- 15 A. Near the pool.
- Q. Okay. Is that deck connected to your house, the pool deck?
- A. By this deck. There's steps that go -- it's lower; it's a lower deck.
- Q. Understood. Is the lower deck on the ground?
- 21 A. Yes.
- Q. Okay. Is that also a wooden deck?
- 23 A. Yes.
- Q. Are there any other parts of this diagram that appear to be inaccurate to you, or is this

		Page 158
1		otherwise okay?
2	A.	It looks okay.
3	Q.	So at the top there are three bedrooms, the
4		top level?
5	A.	Yes.
6	Q.	And one bath at the top?
7	A.	Mm-hmm. Yes.
8	Q.	And the bottom there are those two extra
9		bedrooms, right?
10	A.	Yes.
11	Q.	And the bath at the bottom?
12	A.	Yes.
13	Q.	Okay. Would you please turn to page 28 of
14		this document?
15		Do you see at the top it says subject,
16		photo page?
17	A.	Yes.
18	Q.	Are these photos of your house, the exterior?
19	A.	Yes.
20	Q.	And in the middle photo, I see there is
21		there is a deck that is raised off the ground
22		correcting to the upper level.
23		Do you see that?
24	A.	Yes.
25	Q.	And then off to the right, is that is that

		Page 159
1		where that lower deck is?
2	A.	Yes.
3	Q.	Okay. Do you have a fireplace in your house?
4	A.	No.
5	Q.	What does the chimney connect to?
6	A.	The oil furnace.
7	Q.	Have you ever had the gutters changed in your
8		house?
9	A.	Yes.
10	Q.	When was the last time that was done?
11	A.	I don't recall.
12	Q.	Do you have any pictures of the outside of
13		your house besides these?
14	A.	I don't believe so.
15		(Deposition Exhibit No. 16 was marked for
16		identification.)
17	Q.	Mrs. Crawford, do you have a copy of
18		Exhibit 16 in front of you?
19	A.	Yes.
20	Q.	Do you see at the top it refers to change in
21		appraisal of real estate?
22	A.	Yes.
23	Q.	And do you see the date up there of June 5th,
24		2008?
25	A.	Yes.

Page 160 1 And it's addressed to you and Ted, correct? Q. 2 Α. Correct. 3 And this indicates in the middle that the Ο. 4 previous real value was assessed at \$122,600, 5 correct? 6 Α. Correct. 7 And that the new value is \$136,200, right? Q. 8 Α. Correct. 9 Ο. So that was an increase in the appraised value 10 of the property in 2008, right? 11 Α. Yes. 12 And did that result in an increase in the tax Q. 13 bill for the property? 14 Yes. Α. 15 In -- as of 2008 do you have any reason to Q. 16 disagree with the value of the property being 17 \$136,200? 18 Α. No. 19 (Deposition Exhibit No. 17 was marked for 20 identification.) 21 Mrs. Crawford, you have been handed a copy of 22 Exhibit 17. 23 Do you see that? 24 Α. Yes. 25 This is a tax bill from the Town of 0.

		Page 161
1		Bennington, correct?
2	A.	Correct.
3	Q.	And at the top it's dated March 13, 2017.
4		Do you see that?
5	A.	Yes.
6	Q.	And this covers the tax year 2016 to 2017,
7		correct?
8	A.	Yes.
9	Q.	This was mailed to you and your husband at
10		your home, right?
11	A.	Yes.
12	Q.	On the right-hand side, do you see the
13		appraised value, house site value, in that
14		box?
15	A.	Yes.
16	Q.	It says \$136,200, correct?
17	A.	Correct.
18	Q.	Do you have any reason in 2017 to disagree
19		with the assessed value of your property here?
20	A.	No.
21	Q.	Do you have homeowners insurance on your
22		property?
23	A.	Yes.
24	Q.	Who in your household decides how much
25		insurance to purchase for your property?

- A. Let's see, I think my husband had the conversation with the agent. So between the two of them they came up with something.
- 4 Q. Who is your agent?
- 5 A. Hartford.
- 6 Q. Do you know the name of the agent?
- 7 A. No. We get it through AARP.
- 8 O. AARP?
- 9 A. Yeah. So we deal with them directly if we have an issue.
- 11 Q. Do you believe your house is fully insured?
- 12 A. Yes.
- Q. So if there were say a fire that destroyed the house, the insurance could pay to rebuild it?
- 15 A. I believe so.
- Q. Do you pay your insurance premiums for your homeowners insurance?
- 18 A. We do, yes.
- 19 Q. You ever tried to sell your house?
- 20 A. No.
- Q. You ever tried to rent your house?
- 22 A. No.
- Q. Do you have any plans to rent your house?
- 24 A. No.
- 25 Q. Do you have any plans to sell your house?

- A. Nothing definite. My husband is going to retire in 59 days, and we don't know what we're going to do. We haven't made any real plans.
 - Q. As of today you don't have a plan to sell the house?
- 7 A. No.

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- 8 Q. 59 days and counting, huh?
- 9 A. I've got something right on the refrigerator.
- Q. Have you ever talked to a real estate agent
 about the value of your house in the last ten
 years?
- 13 A. No.
- Q. Have you ever put your house on the market in the last ten years?
- 16 A. No.

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- Q. You mentioned when your well pump was replaced that there was a water quality test. Do you recall that? Do you recall saying that?
 - A. I recall saying that. You know, I am sure they did because I think that is common practice, but I -- I don't know for sure.
 - Q. Other than that, do you recall any water ever being tested prior to 2016 for any chemicals in the water?

Page 164 1 Not for chemicals, no. Α. 2 Q. For anything else? 3 Periodically we would have it tested, but that Α. was before it was sealed because we feel very 4 5 confident that it was okay, but we would have 6 it tested for bacteria, and it was always all 7 right. 8 Who would do the test for bacteria? Ο. 9 Α. The department of health. 10 Did they charge you for that test? Q. 11 Α. Yes. 12 Have any of those tests resulted in any Q. finding of bacteria in the water? 13 14 No. Α. 15 Q. Have you ever had your soil tested for 16 chemicals at your property? 17 Α. No. 18 Have you ever appraised a home yourself? Q. 19 Α. No. 20 Q. Do you have any real estate license? 21 Α. No. 22 Q. Have you ever listed someone else's property 23 for sale before? 24 Α. No.

Do you have any experience valuing a property,

Q.

		Page 165
1		a residential property?
2	A.	No.
3	Q.	Have you ever performed any research into
4		residential property values before?
5	A.	No.
6	Q.	Do you live in a residential neighborhood?
7	A.	Yes.
8	Q.	Is there any commercial zone or business in
9		the area of your neighborhood?
10	A.	No.
11	Q.	Any
12	A.	No. There is a veterinarian's office but
13		it's it's up the road a ways. That's all.
14		Well, and there is a retail store across
15		the street.
16	Q.	What is the retail store across the street?
17	A.	Antiques.
18	Q.	Antiques?
19	A.	(Nod).
20	Q.	Do you use the vet for your cats up the road?
21	A.	Yes.
22	Q.	Do you entertain socially at home?
23	A.	Not very often.
24	Q.	When was the last time you did that?
25	A.	Thanksgiving.

Page 166 1 So around the holidays you will entertain? 2 Α. Yes. Just family. 3 Do you have any plans to change the Ο. 4 entertainment at your house around the 5 holidays? 6 Α. No. 7 Q. Do you use your house for any commercial 8 activity? 9 Α. No. 10 So Mr. Crawford works outside the house, Q. 11 correct? 12 Α. Correct. 13 Q. For income? 14 Α. Yes. 15 Q. And you have worked for income outside the 16 house? 17 (Nod). Α. Yes? 18 Q. 19 Α. Yes. 20 Does anyone use your land for sports? Q. 21 Α. No. 22 Q. After PFOA was detected in your water, did you 23 do anything to make any effort to remediate 24 the presence of PFOA in your water? 25 MS. JOSELSON: Objection. You can

Page 167 1 answer. 2 Α. I wouldn't know how to begin. BY MR. LAFATA: 3 4 Is that a no? Q. 5 Α. That's a no. 6 0. What about with the soil, have you taken any 7 steps to remediate any of your soil? 8 Α. No. 9 Did you live at your home at the time that Q. 10 ChemFab's business was operating on Water 11 Street? 12 Α. Yes. 13 Q. Did you ever go to the facility? 14 Α. No. 15 Do you remember the facility in particular? Q. 16 MS. JOSELSON: Object to the form. 17 can answer it. 18 Α. Yes. 19 BY MR. LAFATA: 20 Were you aware it was there when it was open? Q. 21 Open? Oh, when it was operating? Α. 22 Q. Yes. 23 Α. Yes. 24 What, if anything, do you remember about it? Q. 25 I remember a woman I worked with complaining Α.

Page 168 1 about how it smelt so bad because she lived 2 nearby. 3 Did you smell anything from the facility where Ο. 4 you lived? 5 Α. No. 6 0. Did you ever meet or talk to anyone who worked 7 at ChemFab? 8 Α. No. 9 Q. Do you know what business was done at that 10 ChemFab facility? 11 I understand they make Teflon, like for pots Α. 12 and pans, and waterproof material. 13 Q. Anything else? 14 Α. No. 15 Q. Did you live in your home at the time that the 16 ChemFab facility was open on Northside Drive? 17 Α. No. 18 Q. Have you talked to any realtor about any 19 change in the value of your property due to 20 PFOA? 21 Α. No. 22 Q. Have you talked to any appraiser about any 23 change in your property value due to the 24 presence of PFOA? 25 Α. No.

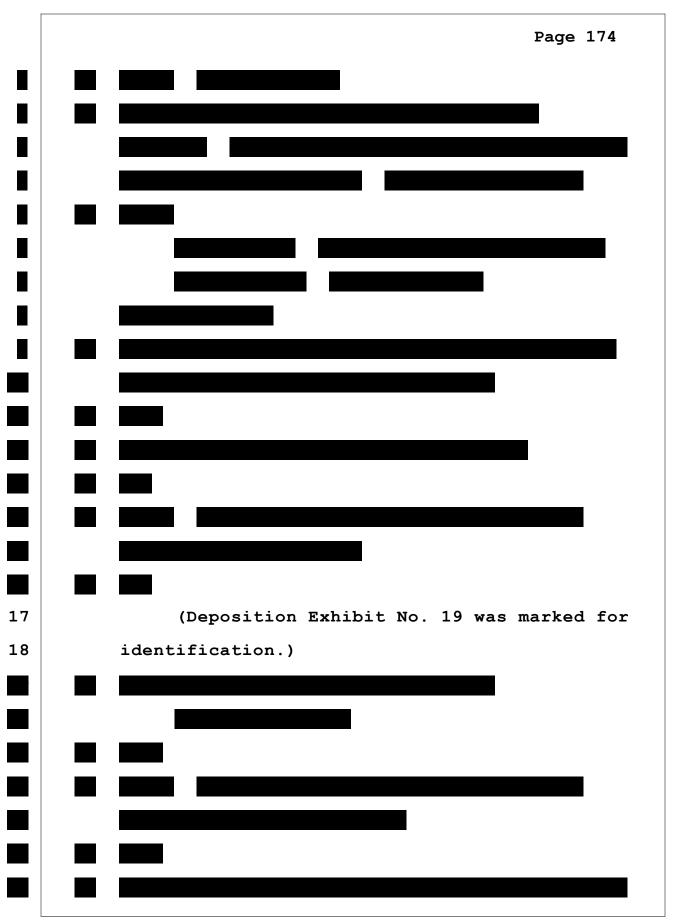


Page 170 1 Who do you know? Q. 2 My neighbors on both sides of me, Lauren and Α. 3 Donna. 4 Do you have Exhibit 13 in front of you still? Q. That? 5 13. 6 Α. 7 Q. Mm-hmm. 12. 11, 1, 14. 8 Α. 9 Ο. 13. 10 Α. 13. Thank you. 11 MR. LAFATA: Thank you, Emily. 12 Α. 13. 13 Q. Thank you, yes. 14 At the top there, do you see on the upper 15 left the name James Sullivan? 16 Α. Yes. 17 Do you know Jim Sullivan or Leslie Addison? Q. 18 Α. No. 19 Do you know William Sumner? Q. 20 Α. No. 21 Do you know Ronald Hausthor? Ο. 22 Α. I don't know them. I know of them. 23 Okay. What about Gordon Garrison? Ο. 24 Α. No. 25 Do you know Bill Knight? Q.

Page 171 1 Α. No. 2 Q. Have you had any conversation with any of 3 those plaintiffs about this case? MS. JOSELSON: You mean not associated 4 5 with counsel. BY MR. LAFATA: 6 7 Other than any --Q. 8 Α. No. No. Have you ever had any conversations with 9 Q. 10 anyone from Saint-Gobain about this case? 11 Α. No. 12 Q. Have you ever met anyone from Saint-Gobain? 13 Α. No. 14 When was the first time you had heard the name 0. 15 Saint-Gobain? 16 Well, when my coworker would complain about 17 it, but that's all. She would just come in 18 and say, oh, it smells so bad over there 19 today. 20 In connection with the old plant operations Q. 21 you mean? 22 Α. The one on Water Street. 23 Have you ever had any communications with any 0. 24 members of state government agencies or 25 elected officials about PFOA or Saint-Gobain

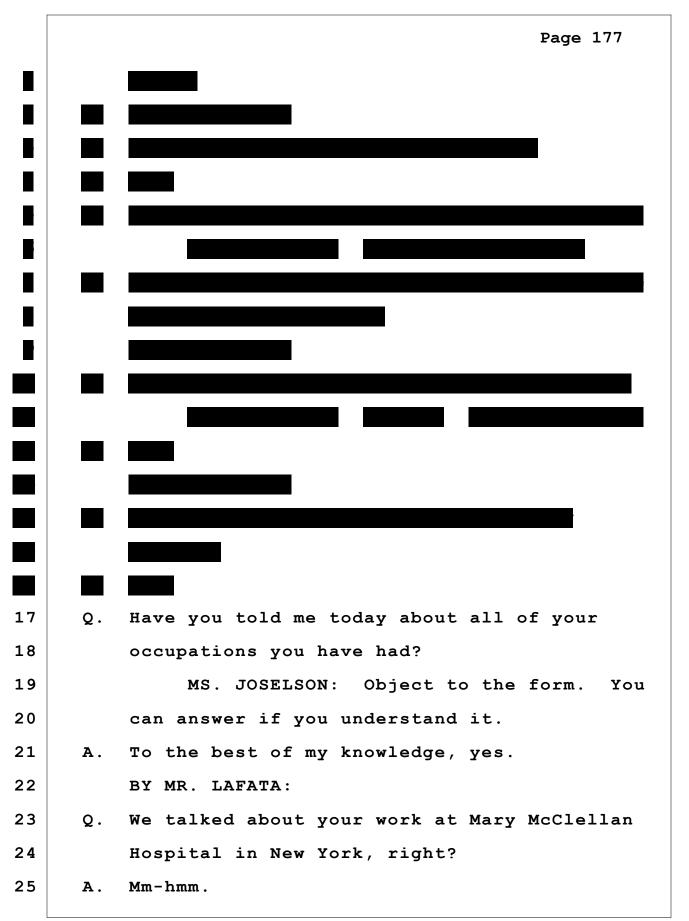
Page 172 1 or ChemFab? 2 MS. JOSELSON: Object to the form, but 3 you can answer it. Any conversations? 4 Α. 5 BY MR. LAFATA: 6 Ο. Mm-hmm. 7 Only, you know, we went to the informational Α. 8 meetings and met, you know, representatives of 9 the state government, but I didn't really have 10 a one-on-one conversation. 11 Just sort of sat in a --0. 12 Sat in, and I did ask -- I asked a question Α. 13 because that was when the zone of 14 contamination was still being expanded, and we 15 were really close. And he told me that --16 that's when he told that what they were doing 17 was testing the wells until they got a number 18 of them negative, and we were next, that it 19 was -- it was still expanding, would include 20 us. 21 That conversation happened in that meeting? Ο. 22 Α. At that meeting just kind of with a whole 23 bunch of people and everybody was asking 24 questions. 25 Q. Was Mr. Crawford with you at the meeting?

		Page 173
1	Α.	Yes.
2	Q.	Have you ever had any other communications
3		with anyone with the state government about
4		PFOA or Saint-Gobain or this case?
5	A.	No.
6	Q.	What about the federal government?
7	A.	No.
8	Q.	Have you ever written any letters to an editor
9		about this case?
10	A.	No.
11		(Deposition Exhibit No. 18 was marked for
12		identification.)

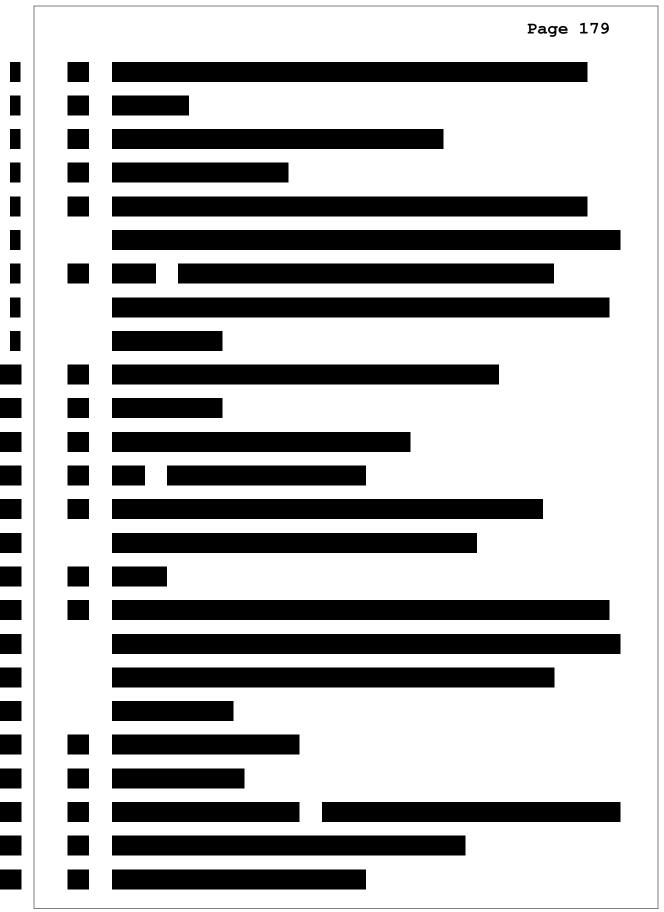


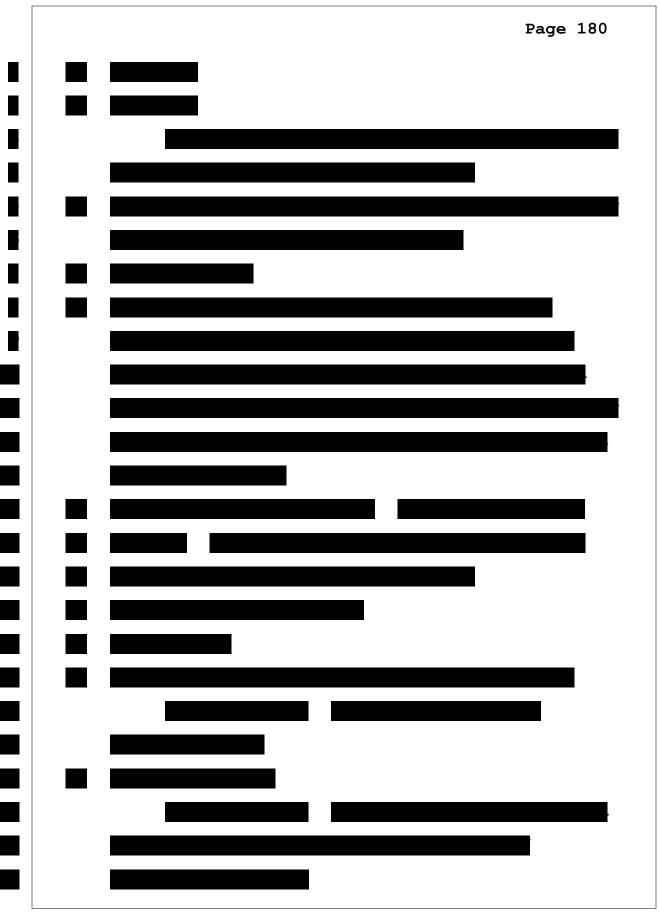


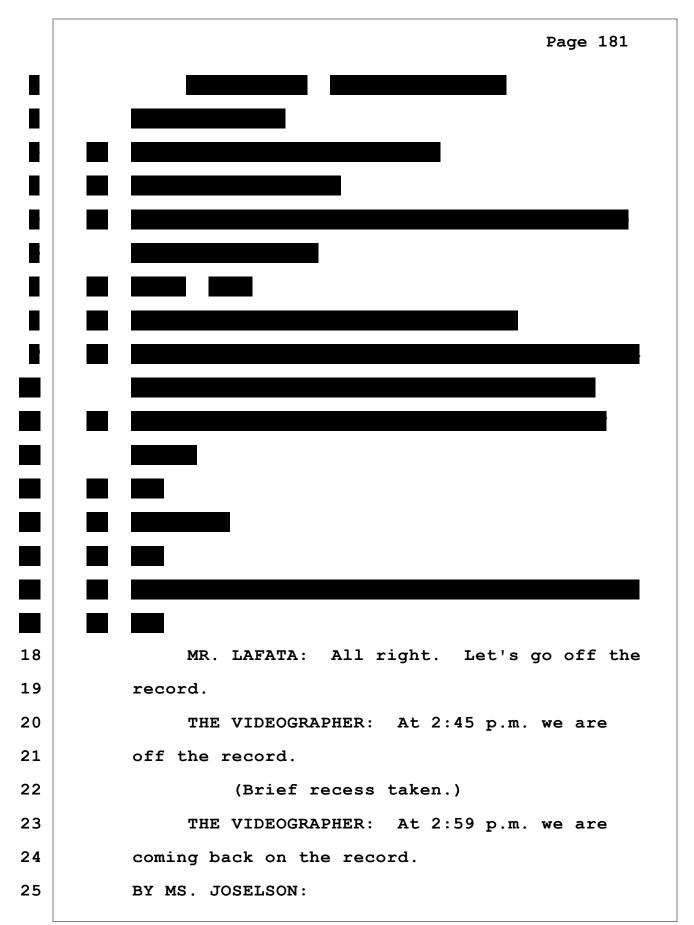
		Page 176
1		Vermont Veterans' Home, how many days a week
2		did you work?
3	Α.	Five.
4	Q.	And what were your hours?
5	Α.	Seven to 3:30.
6	Q.	Was that every day?
7	A.	Yes.
8	Q.	Do you know the let me rephrase.



		Page 178
1	Q.	And your work at Southwest [sic] Vermont
2		Medical Center, right?
3	A.	Yes.
4	Q.	And your work at the Vermont Veterans' Home,
5		correct?
6	A.	Correct.
7	Q.	Have you ever been employed anywhere else?
8	A.	No.
9	Q.	Did you ever do nursing services in any
10		operation rooms?
11	Α.	No.

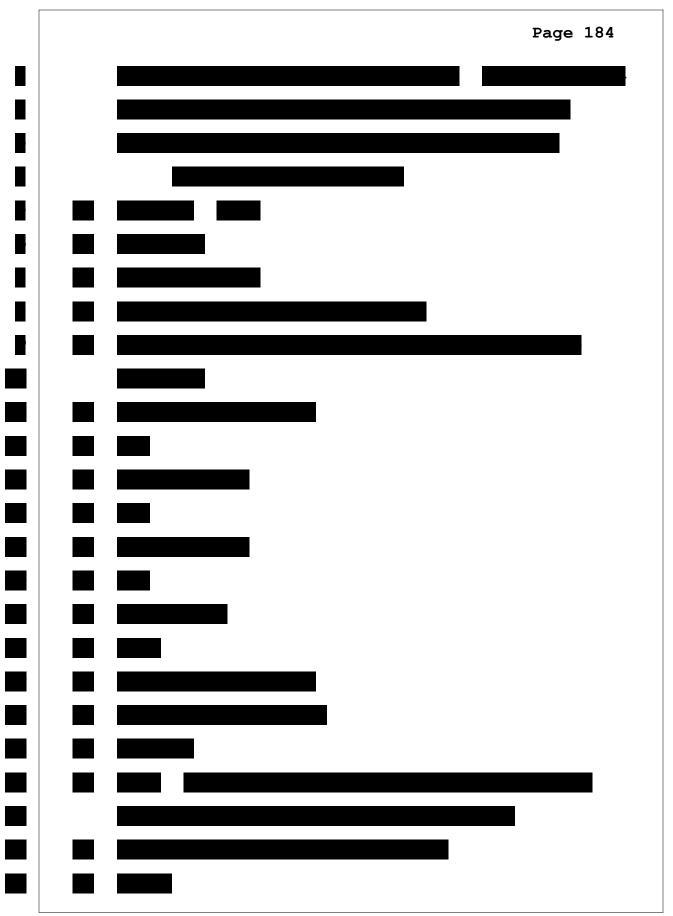


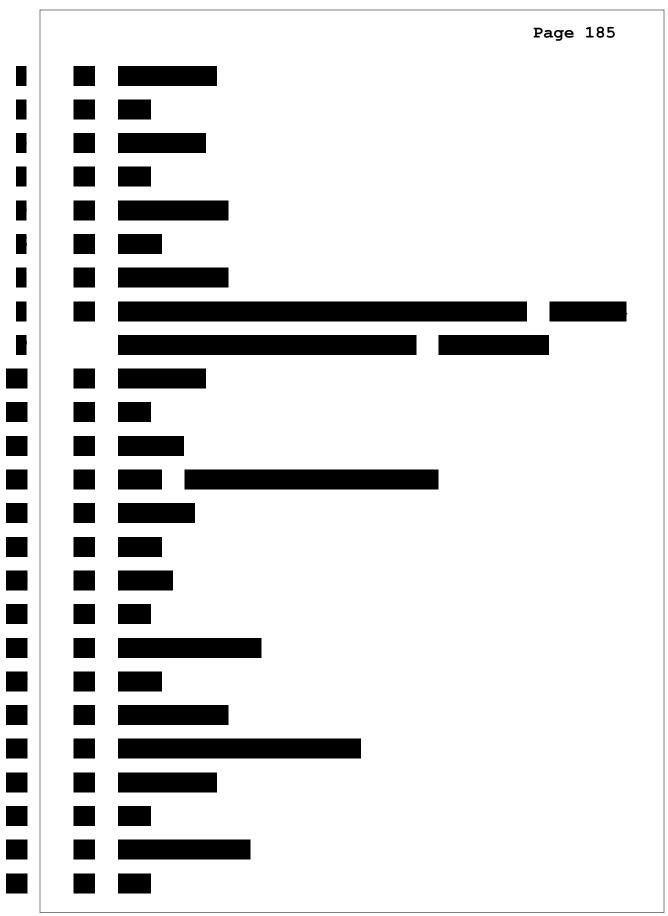


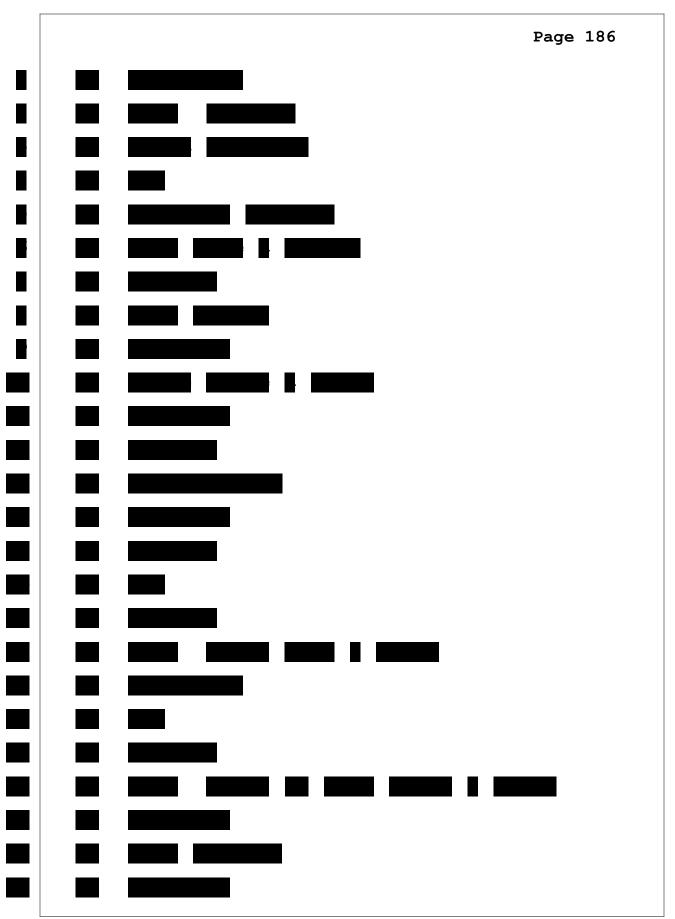


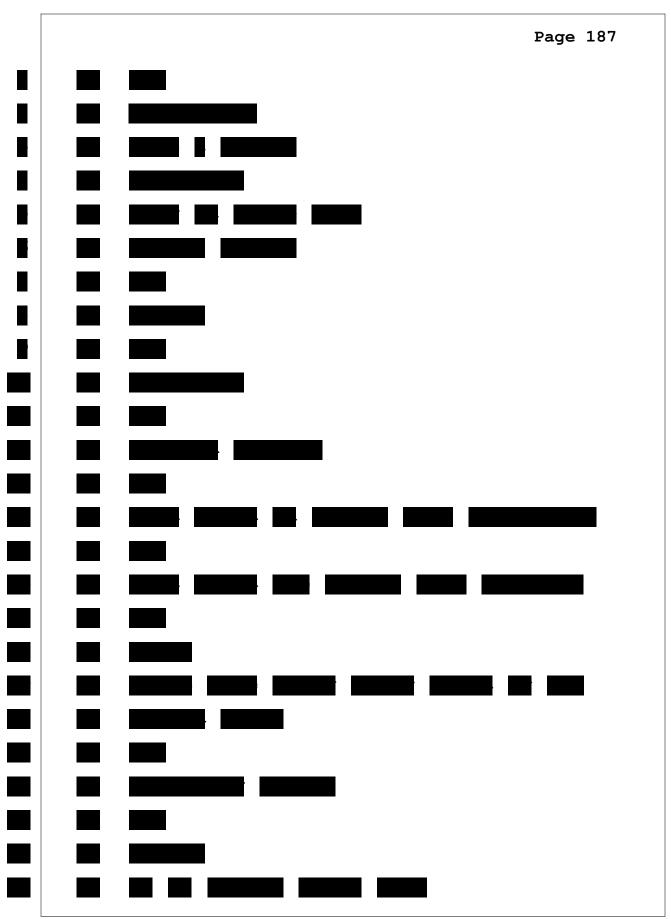
		Page 182
1	Q.	Mrs. Crawford, you ready to continue?
2	A.	I am.
3	Q.	A question about your dishwasher in the
4		kitchen.
5		Does the water from that come from your
6		well?
7	A.	Yes.
8		(Brief interruption.)
9		(Off-the-record colloquy.)
10		BY MR. LAFATA:

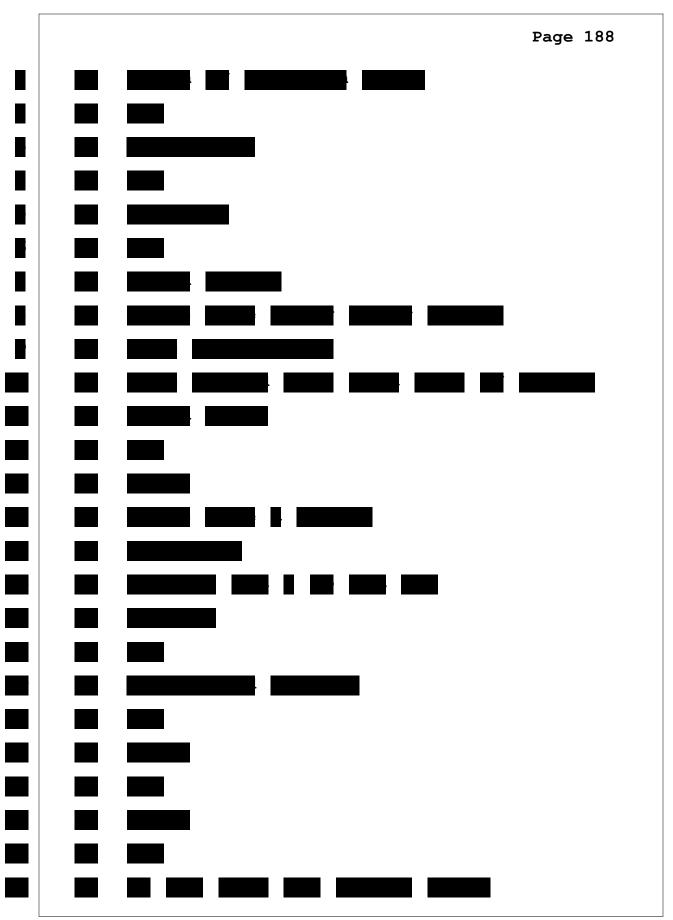




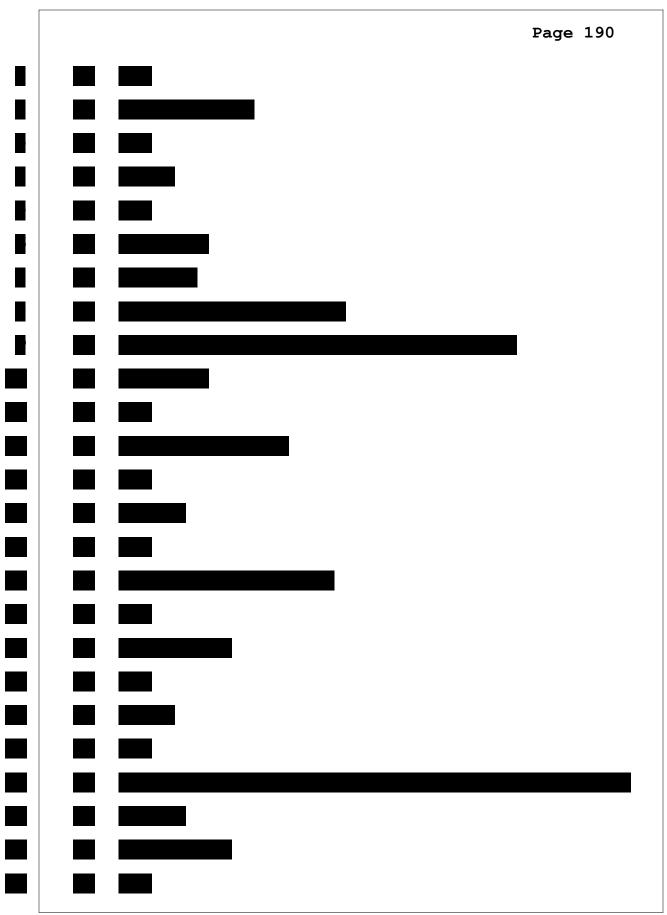


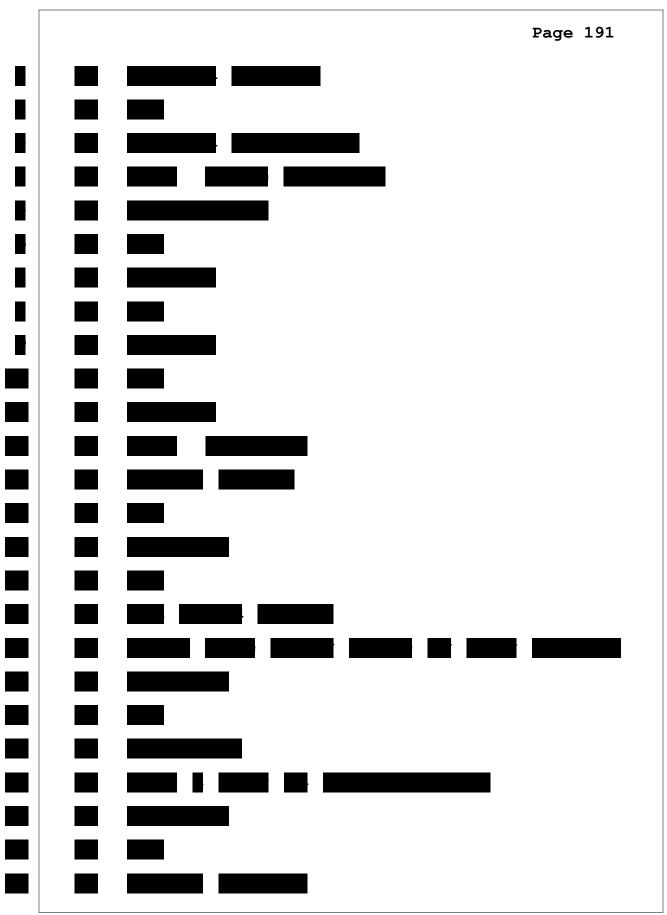


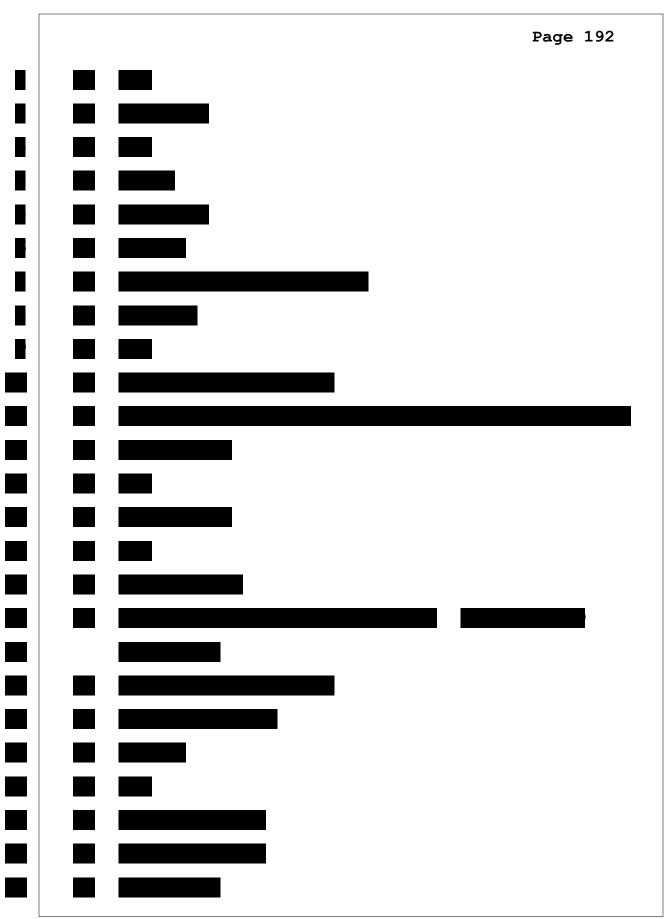


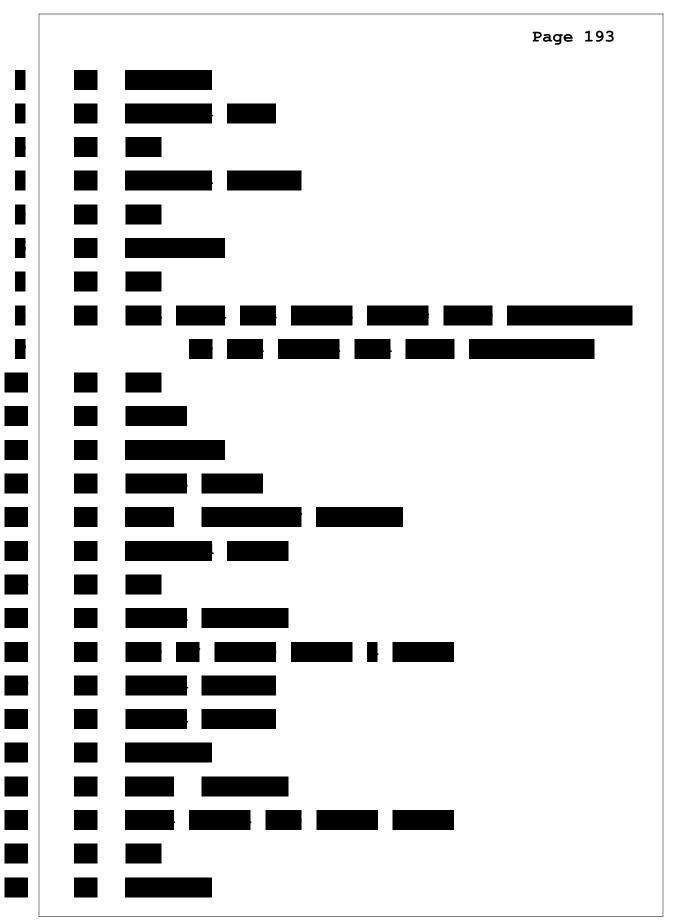




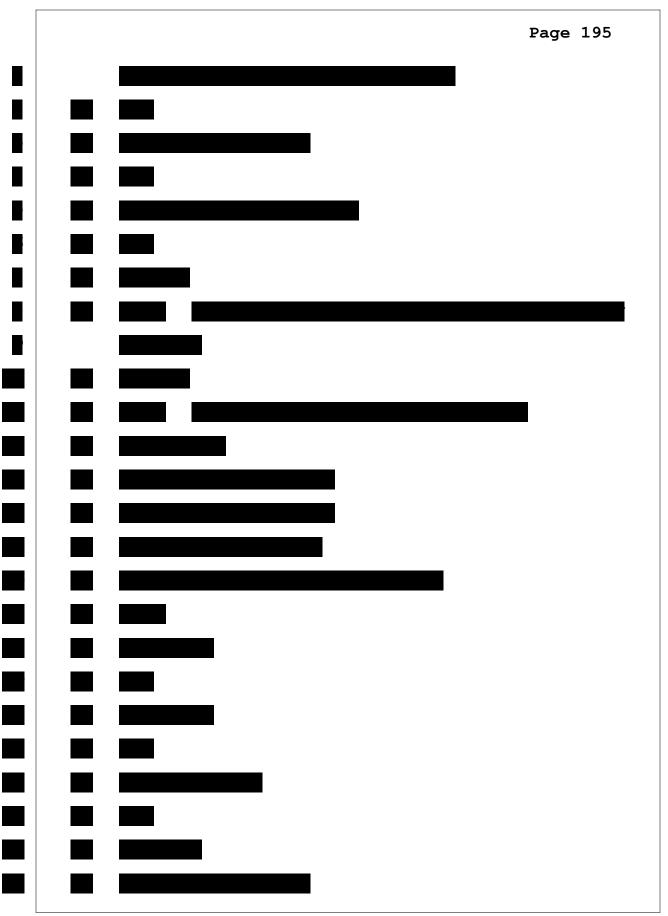
















Page 198 6 0. Are you a member of any civic organizations in 7 the area? 8 Α. Not anymore. 9 Q. When -- when were you in part of a civic 10 organization? 11 Well, like the progressive party, I used to Α. 12 belong to that, and we would go to meetings, 13 but I -- I haven't -- no, I don't join. 14 Okay. Were you involved in any labor union in 0. 15 the area? 16 Α. Yes. 17 What was that? Q. 18 Α. VSEA. 19 VSEA? Q. 20 Yes. Vermont State Employees Association. Α. 21 Did you have a leadership role in the VSEA? Ο. 22 Α. I was steward and president of the local 23 chapter. 24 Q. When were you the president of the local 25 chapter?

Page 199 1 Oh, let's see. It was 2-0-6 or 2-0-8. Α. 2 Q. How long were you a part of the VSEA? 3 MS. JOSELSON: What would the possible relevance of that be? How could that possibly 4 5 lead to the discovery of any relevant 6 evidence? 7 MR. LAFATA: The objection is improper. 8 BY MR. LAFATA: 9 Q. You can answer the question. MS. JOSELSON: 10 The question is improper. 11 MR. LAFATA: Don't interfere with the 12 deposition. If you have an objection, you can 13 make it, but a speaking objection is improper 14 and you know that. BY MR. LAFATA: 15 16 Ms. Crawford, you can answer --Ο. 17 MS. JOSELSON: You know that discovery is 18 supposed to lead to the discovery of relevant 19 evidence. 20 BY MR. LAFATA: 21 Ms. Crawford, you can answer the question. 22 MS. JOSELSON: I think this is an 23 interference with her first amendment rights 24 and political association. Completely

inappropriate.

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		Page 200
1		MR. LAFATA: That objection is
2		inappropriate and you know that.
3		MS. JOSELSON: I think the question is
4		inappropriate.
5		MR. LAFATA: Well, you've made your
6		objection. You can file a motion if you want.
7		MS. JOSELSON: I think we will.
8		MR. LAFATA: Go for it.
9		BY MR. LAFATA:
10	Q.	Go ahead.
11	A.	I joined VSEA the first week I was employed at
12		the veterans' home, which was '87, and I
13		stayed a member until the day I retired.
14	Q.	Were you part of any labor union organizations
15		at your other jobs?
16	A.	No.
17		MS. JOSELSON: Same objection.
18		BY MR. LAFATA:
19	Q.	Other than the progressive party and the VSEA,
20		were you part of any other civic organizations
21		in the area?
22		MS. JOSELSON: Objection, but you can
23		answer.
24	A.	I am thinking. No.
25		BY MR. LAFATA:

Page 201

- Q. Were you part of any organization involving fluoridated water?
- A. Oh, yes. Yes. Bennington Citizens Against
 Fluoridated Water.
- Q. And how long were you part of that organization?
 - A. I still am. We formed that about, boy, maybe five or six years ago when there was a push to add it to the water.
 - Q. What sort of work do you do as part of this organization?
 - A. Well, when there was an active push to put it in the water and it was going to be voted upon, myself and other members of the group would hold public meetings. We would have slideshows. We would have experts come in. We went door to door before the town meeting and we won.
 - Q. The outcome of the vote was favorable?
 - A. The outcome of the vote was no fluoride.
 - Q. Before joining Vermont Citizens Against
 Fluoridated Water, did you have any
 involvement with any organizations about
 fluoridated water?
- MS. JOSELSON: Objection. You can

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Page 202 1 answer. 2 Α. Paul Connett is the expert, and I would be on his -- I liked his page and got all his 3 articles. 4 5 BY MR. LAFATA: 6 Q. What page do you mean? 7 Facebook -- Facebook page. Α. 8 Did you ever write letters to the editor as Q. 9 part of being in Vermont Citizens Against 10 Fluoridated Water? 11 Yes, I did. Α. 12 MS. JOSELSON: Same objection, to this 13 whole line of questions. 14 (Deposition Exhibit No. 20 was marked for 15 identification.) 16 BY MR. LAFATA: 17 Ms. Crawford, do you have Exhibit 20 in front 18 of you? 19 I do. Α. 20 And do you see at the top it says: War of Q. 21 words, with teeth? 22 Α. Yes. Not my words but the editor put that. 23 The editor put that. Ο. 24 Did you write this -- the rest of this 25 letter to the editor?

Page 203 1 Yes, I did. Α. 2 Q. Okay. Do you recall receiving any response to 3 your letter? I don't recall. 4 Α. 5 In the first sentence you say, we would like 0. 6 to respond to an article by Sam Hemingway. 7 Do you see that? 8 Α. I do. 9 And who -- when you say we, do you know who Q. 10 you're referring to? 11 The other advocates that were in my group. Α. 12 And who is Sam Hemmingway? Q. 13 Α. He is a reporter for the Burlington Free 14 Press. 15 (Deposition Exhibit No. 21 was marked for 16 identification.) 17 Ms. Crawford, do you have Exhibit 1 in front 18 of you? 19 I do. Α. 20 Is this the article by Sam Hemingway that you Q. 21 were responding to? 22 Α. Yes. 23 I would just like to note MS. JOSELSON: 24 that both Exhibit 20 and 21 seem to have 25 markings on them that the witness did not

Page 204 1 make. They were presented to her in that 2 I also object to both exhibits. 3 BY MR. LAFATA: Ms. Crawford, on Exhibit 20, do you see in the 4 Q. 5 second paragraph you refer to a man name Tommy 6 Ivey? 7 Α. I believe -- yes, I do. 8 And who is Tommy Ivey? 0. 9 Α. I don't recall. I believe he is a dentist. 10 Okay. And in Exhibit 21, do you see on the Q. 11 far right-hand column there is a paragraph at 12 the top, says Ivey said. 13 Do you see that? 14 Α. Yes. Ivey said 3200 studies have determined that 15 Q. 16 fluoridation has no downside. 17 Do you see that section? I do. 18 Α. 19 And in the next paragraph, do you see it says, 20 he also said fluoride is natural -- naturally 21 in all water, including ocean water, so 22 Crawford's allergy claim is impossible, and 23 the idea that public water systems are being 24 used as a dumping ground for bad fluoride 25 defies logic.

Page 205

Do you see that?

A. I do.

- Q. Do you have a reaction to his statement?

 MS. JOSELSON: Objection. You can answer it. We'll move to strike.
- A. Natural fluoride comes from rocks, water going over and gradually breaking it down to little tiny increments. Water has it.

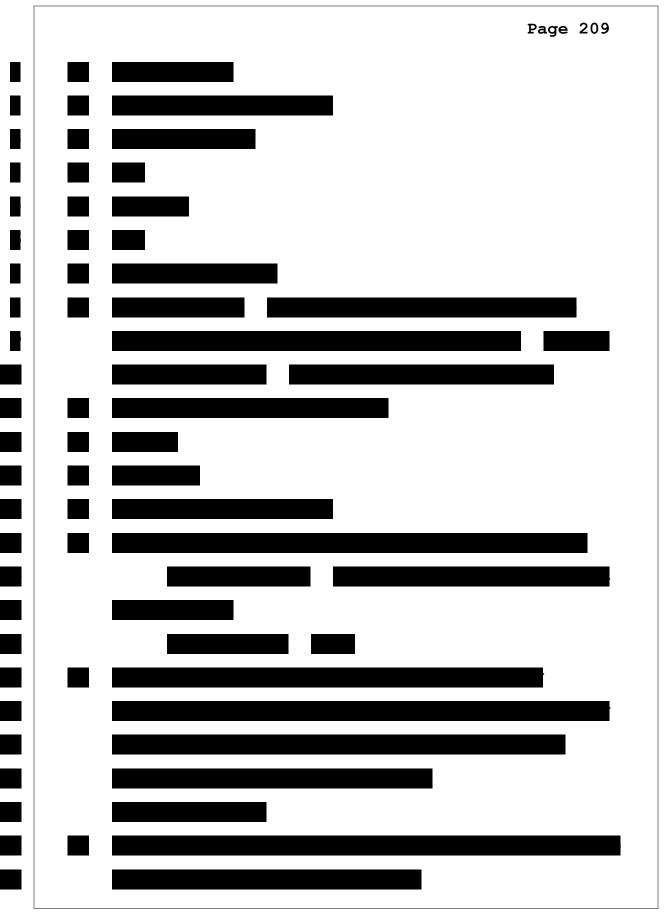
The fluoride they add to the water systems to fluoridate the water is a byproduct of phosphate fertilizer production. The smokestacks are shaken; the residual toxic waste product is collected; put into bags; transported across the country in trucks marked hazard. There has been some accidents and people have had to be evacuated from miles around because the fluoride that they add is -- is toxic. It's not a natural mineral. It's not even a mineral, the breakdown of rocks.

Of those studies, Paul Connett, the expert that's noted, tried to get those studies. They don't exist. They are things that dentists write. And in the oath that dentists take, part of the thing they promise

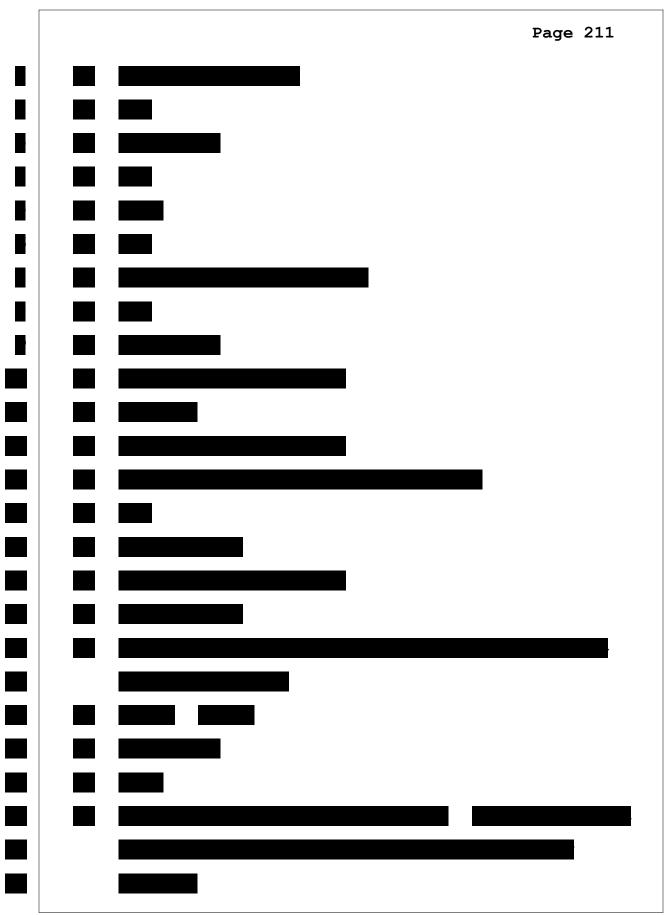
Page 206 1 to do is to push water fluoridation. 2 have their own agenda. And I think it's bull. 3 That is my reaction. BY MR. LAFATA: 4 5 Well, thank you. Q. 6 And when you said that Paul was trying to 7 get these studies, do you mean the studies 8 referred to by Ivey here? 9 Α. Yes. 10 He was not able to get those? Q. 11 Α. There are no -- there are no scientific 12 studies. 13 Paul Connett is in your article here? Q. 14 Yes. He goes worldwide against water Α. 15 fluoridation. 16 When you wrote the letter to the editor, 0. 17 Exhibit 20, do you author the text of the 18 letter yourself? 19 Yes, I wrote it myself. Α. 20 Did you do your best to be truthful in what Q. 21 you said in the letter? 22 Α. I did. 23 MS. JOSELSON: My objection continues 24 through this whole line. 25 (Deposition Exhibit No. 22 was marked for

		Page 207
1		identification.)
2		BY MR. LAFATA:
3	Q.	Ms. Crawford, do you see Exhibit 21 in front
4		of you?
5		MS. JOSELSON: No.
6		BY MR. LAFATA:
7	Q.	What exhibit is in front of you?
8	A.	22.
9	Q.	Thank you for being cooperative.
10		Do you see Exhibit 22 in front of you?
11	A.	Yes.
12	Q.	Do you see at the top this is from the
13		Bennington Banner?
14	A.	Yes.
15	Q.	Dated May 2, 2001. Do you see that?
16	A.	Yes.
17	Q.	And the title, it's emotion, not science. Do
18		you see that?
19	A.	Yes.
20	Q.	Was this a title that you gave to this piece?
21	A.	No.
22	Q.	Do you know who gave that title?
23	A.	I imagine the editor or whoever controls those
24		things at the Banner.
25	Q.	Did you write the article yourself though?

Page 208 1 It's been a while. Let me refresh my memory. 2 Yes. 3 Q. Okay. In the bottom there it says Linda Crawford, right? 4 5 Α. Yes. 6 And kind of like with the last article, when Q. 7 you wrote this one, did you do your best to be truthful with what you said? 8 9 Α. Yes.









		Page 213
1		MR. LAFATA: Pass the witness.
2		CROSS-EXAMINATION
3		BY MS. JOSELSON:
4	Q.	Linda, there were a couple of questions that
5		Mr. LaFata asked you. One concerned Exhibit
6		17. Could you pull that out?
7	A.	I have it.
8	Q.	Okay. And do you remember that this is your
9		2016, 2017 tax bill?
10	A.	Yes.
11		MS. JOSELSON: Is there another tax bill
12		that you showed her, Paul?
13		MR. LAFATA: It was an assessment.
14		MR. SILVER: It was the change in
15		assessment one. There it is.
16		BY MS. JOSELSON:
17	Q.	And Exhibit 16?
18		MR. SILVER: There you go.
19		MR. LAFATA: You got it.
20		BY MS. JOSELSON:
21	Q.	Do you remember being asked questions about
22		these documents?
23	A.	I do.
24	Q.	And do you remember being asked something
25		like I don't have the exact phrasing

Page 214 1 whether you agreed with the assessed value in these documents? 2 MR. LAFATA: Object to the form. 3 MR. SILVER: -- any reason to object to 4 5 that. 6 Α. Are you asking me if we grieved --7 BY MS. JOSELSON: 8 I am asking you if you remember being Q. 9 asked the question by Mr. Lafata, something to 10 the effect of whether you agreed with the 11 assessed value in these documents? 12 MR. LAFATA: Objection to form. 13 BY MS. JOSELSON: 14 Do you remember that question? 0. 15 Α. I do remember that question. 16 So what did you mean by that? Ο. 17 MR. LAFATA: Object to form. 18 Α. I think I understood it did you grieve this 19 assessment. 20 BY MS. JOSELSON: 21 Q. And did you? 22 Α. We did not grieve it. 23 Do you believe that the assessed value in 0. 24 Exhibit 17 reflects what you believe your fair 25 market value of your house is?

Page 215 1 MR. LAFATA: Object to form. 2 Α. No. No, I misunderstood. BY MS. JOSELSON: 3 Okay. So you didn't grieve the -- the 4 Q. 5 assessed valuation listed in Exhibit 17? 6 Α. No. 7 Q. You were also asked some questions about 8 whether you changed any of your patterns of 9 socializing or plans for socializing. 10 Do you remember some of those questions? 11 I do. Α. 12 Other than -- so have you changed at all the Q. 13 ways in which you socialize with people in 14 your house? 15 Α. Well, I have a friend, ever since the PFOA 16 thing came up she won't drink -- even before 17 we started using bottled water -- she wouldn't 18 have a cup of coffee or tea with me unless we 19 used bottled water. 20 She lives outside the zone? Q. 21 She lives in Pawlet. Α. 22 You were also asked questions about Q. 23 out-of-pocket expenses that you have incurred 24 since the discovery of PFOA in your well. 25 Do you remember that?

Page 216 1 Α. Yes. 2 Q. And you mentioned the cost of bottled water 3 that you used? 4 Yes. Α. 5 What about the -- the expense for the water 0. 6 for the pool that you talked about? 7 Α. Oh, yeah. 8 MR. LAFATA: Object to form. 9 Α. We have to pay the town for a permit to use 10 the fire hydrant, so --11 MS. JOSELSON: That is all I have. 12 MR. LAFATA: Mrs. Crawford, some 13 follow-up questions based on your testimony 14 there. 15 REDIRECT EXAMINATION 16 BY MR. LAFATA: 17 Q. Do you have any plan to contact the Town of 18 Bennington or any tax authority to tell them 19 that their assessment of your property is too 20 low? 21 Α. No, because they might say it's too high. 22 don't know -- they might say -- no, because 23 then they would put it up and I would have to 24 pay more taxes. That is why we didn't grieve 25 it.

Page 217 1 If you believe that the Town of Bennington has 2 made a mistake in valuing your property, do 3 you think that you should tell them? MS. JOSELSON: Object to the form. 4 5 No. Α. BY MR. LAFATA: 6 7 Do you think it would be fair for them to be Q. 8 operating underneath that mistake? 9 MS. JOSELSON: Object to the form. 10 I realize that assessed value is not the same Α. 11 as fair market value. So I quess I -- we 12 didn't want to -- we didn't want to grieve it. 13 Q. Have you grieved your tax bill before? 14 Α. Never. 15 Q. Do you know what would be involved in grieving 16 your tax bill? 17 No. Α. 18 During lunch or any of the breaks today, did Q. 19 you discuss the substance of your testimony 20 with anybody? 21 MS. JOSELSON: Other than counsel? 22 BY MR. LAFATA: 23 Did you discuss the substance of the testimony Ο. 24 today? 25 MS. JOSELSON: You can't ask any

Page 218 1 questions regarding what discussions our 2 clients have had with their attorneys. 3 MR. LAFATA: The substance of live testimony, you're objecting to that? 4 5 MS. JOSELSON: I'm telling you I will 6 instruct this witness not to answer any 7 questions regarding discussions that she has 8 had with counsel at any time. BY MR. LAFATA: 9 10 Mrs. Crawford, my question to you is, did you Q. 11 have any discussion during the lunch or break 12 about the substance of your testimony during 13 today's deposition? 14 MS. JOSELSON: And I'm instructing the 15 witness not to answer any questions regarding 16 discussion with counsel. You can ask her if 17 she's had any discussions with anyone about 18 the substance of her testimony other than 19 counsel. 20 BY MR. LAFATA: 21 About that. Ο. 22 Α. Would you repeat? 23 0. Sure. 24 Other than counsel, have you had any 25 discussions about the substance of your

		Page 219
1		testimony today?
2	A.	I haven't even seen anybody other than my
3		counsel.
4	Q.	Mm-hmm. Okay.
5		MR. LAFATA: Pass the witness.
6		MS. JOSELSON: You know you're not
7		allowed to ask any questions that a witness
8		that a plaintiff talks to the attorneys about.
9		MR. LAFATA: Do you have any redirect
10		questions?
11		MS. JOSELSON: No.
12		MR. LAFATA: All right. I leave open the
13		deposition in case there's additional
14		discovery that comes forward.
15		MS. JOSELSON: Yeah, we'll object to
16		that.
17		MR. LAFATA: Yeah.
18		THE VIDEOGRAPHER: At 3:40 p.m. we've now
19		reached the end of the media unit number
20		three, and we are going off the record and
21		concluding our deposition. And we are off the
22		record.
23		* * * * * * * *
24		
25		

	Page 220
1	ACKNOWLEDGMENT OF DEPONENT
2	
3	I have read the foregoing transcript of
4	my deposition and except for any corrections or
5	changes noted on the errata sheet, I hereby
6	subscribe to the transcript as an accurate record
7	of the statements made by me.
8	
9	
10	LINDA CRAWFORD
11	
12	SUBSCRIBED AND SWORN before and to me
13	this day of, 20
14	
15	
16	
17	NOTARY PUBLIC
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20	My Commission expires:
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Page 221 1 CERTIFICATE I, Beth Gaige, a Registered 2 Professional Reporter, hereby certify that the within-named deponent was sworn to testify the truth, the whole truth, and nothing but the 5 truth in the aforementioned cause of action. 6 7 I further certify that this deposition 8 was stenographically reported by me and later 9 reduced to print through computer-aided 10 transcription, and the foregoing is a full and 11 true record of the testimony given by the 12 deponent. 13 I further certify that I am a 14 disinterested person in the event or outcome 15 of the above-named cause of action. 16 IN WITNESS WHEREOF, I subscribe my hand 17 and affix my seal this 27th day of April 2018. 18 19 Beth Saige 20 21 Beth Gaige, RPR 22 Notary Public 23 My commission expires: 24 August 22, 2019 25

				Page 222
1			ERRATASHEET	
2	IN RE:	SULLIV	AN, et al. vs. SAINT-GOBAI	:N
3	DATE:	4/25/2	018	
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& 1:16 2:5,9,14,18	136,200 160:7,17	1987 13:25 14:1	116:23 161:6
6:1	161:16	1990 22:21 29:23	163:24 213:9
0	14 4:3 95:19	38:7,11 128:21	2017 3:19,24 48:3
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Federal Rules of Civil Procedure Rule 30

- (e) Review By the Witness; Changes.
- (1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:
- (A) to review the transcript or recording; and
- (B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.
- (2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES

ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF SEPTEMBER 1,

2016. PLEASE REFER TO THE APPLICABLE FEDERAL RULES

OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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